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The Commonwealth of Massachusetts Department of Environmental Quality Engineering Metropolitan Boston - Northeast Region 5 Commonwealth Avenue Woburn, Massachusetts, 01801

935-2160

March 1, 1985

Emerson & Cuming
Dewey and Almy Chemical Division
W.R. Grace and Company
59 Walpole Street
Canton, Ma. 02021

RE: CANTON-"Spill Control
Audit at Plant #2"
- Engineering Report

Superfund Records Center

Attention: Mr. Randolph M. Olson, Plant Manager

Dear Mr. Olson:

On February 27, 1985, Engineers from the Metropolitan Boston/Northeast Region of the Department of Environmental Quality Engineering, Division of Water Pollution Control, met with yo and Ms. Gina McCarthy of the Canton Board of Health to review and inspect the rogress toward accomplishing the recommended actions contained in a report entired:

Amerson & Cuming Canton, Massachusetts Spill Control Audit

at

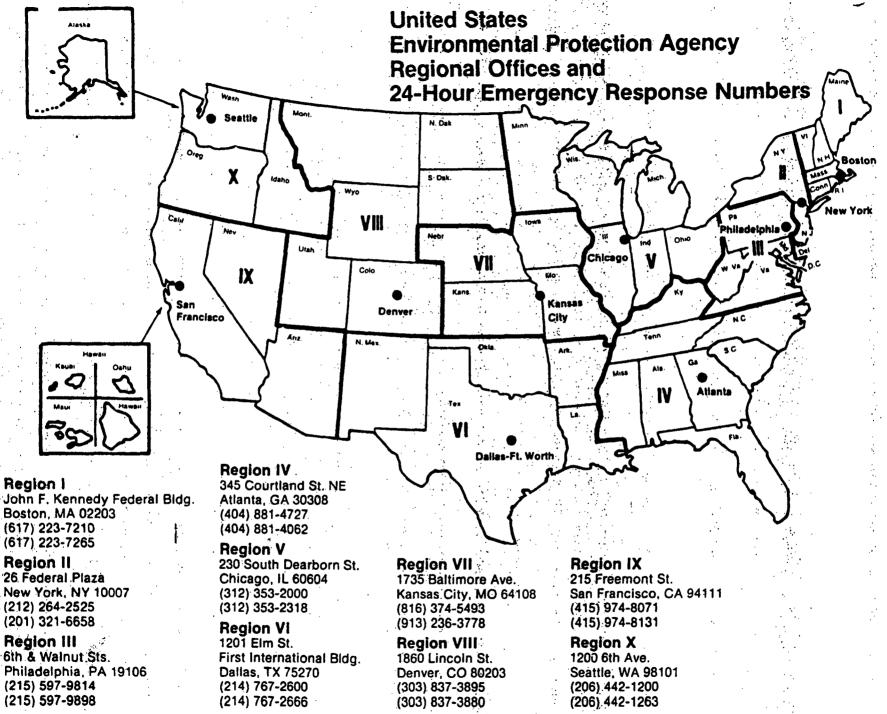
Plant No. 2"

The above report was prepared by Camp Dresser & McKee, Inc., and dated January, 1983. The report was requested in a letter from the Department, dated November 5, 1982 and was the result of an inspection of your facility at the above address on November 2, 1982. The inspection was conducted at the request of the Canton Board of Health to investigate the drainage patterns both inside and outside the plant as they related to any existing or potential discharge of pollutants to an existing raceway which flows under the building and property. The raceway is diverted from the East Branch River of the Neponset River and discharges back to the River through a 24 inch concrete pipe. The Board of Healths concern in this matter was the potential for any pollutants to reach the Town Wells downstream from your facility.

The inspection at that time did not reveal the presence of any existing discharges nor the appearance of any pollutants at the outfall pipe. However; the Department's letter did point out that due to the existance of the raceway, certain chemical storage and the use of these chemicals, or unauthorized use presented a potential discharge. Therefore; the Department recommended that some appropriate steps be taken to address this potential discharge.

As a result, the aformentioned report addressed these issues and made recommendations including, sealing the entrance to the raceway, sealing grates, trenches, drains and accesses from the plant, paving along Walpole Street, to

ويوادي والأراز والمحمول والمنازية المدارية الأمار والمراوية فأحر



Note: The first telephone number is a general number, and the second number is the 24-hour Emergency Response number.

		I AN IMENT OF T	KANSFORTATION	Form Approved OMB No. 04-5613		
c	HAZA INSTRUCTIONS: Submit this report in dupli Bureau, Department of Transportation, Washi complete that item under Section H, "Remark may be obtained from the Director, Office of reproduced and used, if on the same size and I	icate to the Director, Of ngton, D.C. 20590, (AT cs", keying to the entry Hazardous Materials Op-	IN: Op. Div.). If space ; number being completed	als Operations, Materials Transportation provided for any item is inadequate, Copies of this form, in limited quantities.		
	20,000					
A	INCIDENT					
	1. TYPE OF OPERATION 1 AIR 2 HIGHWAY 3 1	RAIL 4 WATER	5 FREIGHT	6 OTHER (Identity)		
	2. DATE AND TIME OF INCIDENT (Month	h - Day - Year)	3. LOCATION OF INC	IDENT		
		e.m.				
В	REPORTING CARRIER, COMPANY OR IN	DIVIDUAL	*			
	4. FULL NAME		5. ADDRESS (Number,	Street, City, State and Zip Code)		
٠,						
	6. TYPE OF VEHICLE OR FACILITY					
	1	<u> </u>	<u> </u>			
C	SHIPMENT INFORMATION					
٠.,	7. NAME AND ADDRESS OF SHIPPER (O	riğin address)	8. NAME AND ADDRE	ESS OF CONSIGNEE (Destination address)		
	↓ Some Some Some Some Some Some Some Some		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
		•				
	9. SHIPPING PAPER IDENTIFICATION I	NO.	10. SHIPPING PAPER	RS ISSUED BY		
			CARRIER SHIPPER			
		e North Anna Canada (Albania) Tagairtí	OTHER			
			(Identity)			
Ŀ		<u> </u>				
D	DEATHS, INJURIES, LOSS AND DAMAGE					
	DUE TO HAZARDOU					
	III. NUMBER PERSONS INJURED	12. NUMBER PERSON	IS RICLED	OF DECONTAMINATION (Round off in dollars)		
l	14. ESTIMATED TOTAL QUANTITY OF	HAZARDOUS MATERIA	LS RELEASED			
ŀ				s		
 -				<u> </u>		
Æ	HAZARDOUS MATERIALS INVOLVED	1		γ- 		
	15, HAZARD CLASS (*Sec. 172.101, Col. 3)		PING NAME 2.101, Col. 2)	17. TRADE NAME		
				•		
1		ļ				
F	NATURE OF PACKAGING FAILURE	<u> </u>		<u> </u>		
Ì	18. (Check all applicable boxes)			······································		
	11) DROPPED IN HANDLING	(2) EXTERNAL	PUNCTURE	. (3) DAMAGE BY OTHER FREIGHT		
	14) WATER DAMAGE	(5) DAMAGE FR	OM OTHER LIQUID	(6) FREEZING		
	17) EXTERNAL HEAT	(8) INTERNAL F	RESSURE	(9) CORROSION OR RUST		
	(10) DEFECTIVE FITTINGS, VALVES, OR CLOSURES	(1:1) LOOSE FIT CLOSURES	TINGS, VALVES OR	(12) FAILURE OF INNER RECEPTACLES		
	(13) BOTTOM FAILURE	(14) BODY OR :	SIDE FAILURE	(15) WELD FAILURE		
	116) CHIME FAILURE	(17) OTHER CO	IDITIONS (Identity)	19. SPACE FOR DOT USE ONLY		

Form DOT F 5800.1 (10-70) (9/1/76)

*-Editorial change to incorporate redesignation per HM-112.

	LEAK OR TEST FAILURE REPORT—TRANSMISSION &	
	BEORE Delan Constanction Described because (April) &	visan for met)
	POSITIONISCHES Complies this soft of this horn he each incident regardless of t Check appropriate but her specific cause of leak or failure and complete the g	personal martifal on the energy side
	COMOSION D DAMAGE BY OUTSOL D CONSTRUCTION IN PART—A PART—B PART—B PARTIES PART—B PARTIES PART—B PARTIES PARTI	where parts are not applicable.)
	to be completed. In all parts of the form which are not applicable, the lette instruction is needed to complete this form, the operator may telephone (Code (617) 494-2192, Monday through Friday, 8:15 a.m., to 4:45 p.m.,	rs "NA" should be inserted so that every item is completed. If additional the Department of Transportation, Transportation Systems Center, Area
	GEN	
	1. OPERATOR INFORMATION	10. PERSONAL INJURY OR PROPERTY DAMAGE RESULTING FROM ESCAPE
	NAME OF OPERATOR	OF GAS
		a. Number of employee(s)
	NUMBER & STREET	(1) Facalities
		(2) Suffering lost-time injuries
	CHA & COMMIA	b. Number of non-employee(s) (1) Fatalities
	STATE & DP CODE	(2) Injured and requiring medical treatment other than on-site first aid
	REPORTING OFFICIAL'S TELEPHONE NUMBER (Imiliade Area Code)	C: Rupture occurred(1) (2)
		d. Gas ignited(1) (2) (2)
	2. LEAK WITH RUPTURE a. Shear fracture (feet) b. Cleavage fracture (feet)	e. Explosion occurred
The state of the s	all respective and the second of the second	6. Incident induced say (1) (2) (2)
	c: Has a fracture soughness test been made on the ma-	secondary explosions or fires
	cerial that failed? (1) \(\subseteq \) Yes (2) \(\subseteq \) No	g. Estimated value of operator's property damage \$
	d. Is a metallutgical analysis planned? (1) \(\subseteq \text{Yes} \) (2) \(\subseteq \text{No} \)	1 11. ENVIRONMENTAL DESCRIPTION
	3. LOCATION AND TIME OF LEAK OR FAILURE	a. Predominant type of stee
	a. Number & Street	(1) At time of construction (2) At time of incident
		Commercial Commercial
	City & County	
•		e Residential e Residential
	State & ZIP Code b. Mile Post c. Survey Station No	d
	Brown and the first term of th	/ D Unknown / D Other (Specify)
	d. Time of Detection e. HOURS & MINUTES BETWEEN TIME OF DETEC-	_
C Tar		
	f. Estimated pressure at point and Maximum allowable operating time of incident	b. Predominant above-ground structure adjacent to leak
	1	Multi-story Single-story
•	(PSIG) (PSIG)	(1) Commercial
	4. LEAK OR FAILURE OCCURRED ON	(2) Industrial
	a. Teansmission system c. C Gathering system	(3) Residential 4 [] 6 [] (4) None []
	b. Transmission line of distribution system	(4) None
	S. PART OF SYSTEM WHICH LEAKED OR FARED	(7) 5121 (3)113))
	a. Part (4). Regulator station	c. Approximate distance to nearest above-ground structure
	(1) Pipeline (5) (1) Meter station	(Within & mile of feat)
	(2) Compressor station (6) Other (Specify)	d. Did other underground facility(ies) contribute to
	(3) Dehydration plant	occurrence of leak in any mannee? (1) Tes (2) No
	b. Date installed	e. If so, what was effect on existence of other facility(ies)?
	a. 🖸 Body of pipe g. 🖸 Scraper trap	f. Was other utility(ice) imperiled by
	b. Girth weld h. Tap connection	the leak? (1) [] Yes (2) [] No
	c. C Longitudinal weld i. C Fitting (Type)	g. Distance of other facility (ies) or utility (ies) from leak or
	4. Other field weld j. Gas cooler	failure location
	e. Compressor k. Other (Specify)	Other facility (ies) contributing to Other utility (ies) Impaired
	f. 🖸 Valve	Ft. (1) 🖯 Other gas (8) 🖸Ft.
	7. MATERIAL WHICH LEAKED OR FAILED	Ft. (2) [] Telephone (9) []Ft.
** * * * * * * * *	a. Steel b. Plustic c. Other (Specify)	Pt. (3) [] Electric (10) [] Ft.
	8. PIPE DESCRIPTION	Fr. (4) Sewers (Storm)(11)
	a. Numinal diameter (Inches) b. Nominal wall thickness	Ft. (5) Sewers (Other) (12)
	(lachti)	Ft. (6) Water (15) Ft Ft. (7) Other (Specify) (14) Ft.
	c. Pipe specification d. Grade	
•	L	h. Location of leak or failure
	9: TYPE OF REPAIR a. Pipe	(1) Within building (5) Below walkway
	(1) Weld over-sleeve (4) Replace pipe (length)	(2) Above ground (6) Below resides a Pered
	(2) Patch-welled feet	(5) Below ground A Median or unpaved
The growing services of the pro-	(3) Clamp (5) Other repair or disposition	(4) Below water (7) Below other paved area
	(Specify)	(Specify)
	h. Component	(i) Depth of rover inches
and the second s	(1) D Replaced (5) D Other (Specify)	(j) Soil information at pipe depth (1) Sail (2) Rock
	(2) Reconditioned	(3) Estimated soil temperature at point of leak
	12. ADDITIONAL DESCRIPTION OF INCIDENT OR FOR CONTINUATION OF EX	PLANAIRUM OF ITEMS ASOVE
	MAME AND TITLE OF REPORTING OFFICIAL	SIGNATURE OF REPORTING OFFICIAL
	# · · · · · · · · · · · · · · · · · · ·	

		NT OF TRANSPORTATION			FORM APPROVED
• •		RRIER ACCIDENT REPORT	•	1	004R5601
Instruc- tions	Complete in duplicate. If the question is not adequate, a Definition of a reportable act of Federal Regulations, Title File both copies of this reportable actions of the second with the Safety Operations, Dep Washington, D.C. 20590.	ne space provided for any trach an additional sheet. cident is stated in the Code 49, Part 195, Subpart B. rt within 15 days after dishe Director, Office of Pipeartment of Transportation,	preparing this Section 195.1 supplied upo copies may be size. This report Failure to report ment for 1 years	56. Specimen on request we e reproduced ort is required ort can result	and in Part 195, Subpart B, copies of this form will be without charge. Additional using the same format and by 49 CFR Section 195.54. In \$1,000 fine or imprison-1 in 18 U.S.C. 832.
A.	1. NAME OF CARRIER.				
Carrier Information	2. PRINCIPAL BUSINESS ADD	RESS			
В.	1. DATE (Month, Day, Year)	2. HOUR AM 4. F	ART OF CARRIER		
Time and	3. LOCATION (State, County, C		TANK FARM	PUMPING STA OTHER (speci	. (a. 1944)
Location of Accident	5. PHYSICAL LOCATION (If io railroads, attach a sketch or di	cation is near public or private be awing showing relationship of ac			ks such as highways or
Accident					
<u>c</u>					
Origin of Liquid or Vapor	METER OR PROVER T	ANK WELDED F	ITTING	BOLTED FITTI	·
Release	SAMPLE HOUSE H	AY TANK STRAINER	OR FILTER	OTHER (Specify	<i>n</i>
D. Cause of Accident	,—	FID	OPERATION BY		ONNEL R (specify)
E.	1. NUMBER OF PE				RSONS INJURED
Death or Injury	CARRIER EMPLOYEES	NON-EMPLOYEES	CARRIER E	MPLUYEES	NON-EMPLOYEES
F.	CARRIER'S DAMAGE (Physical property damaged)	2. ITEMS DAMAGED			
Property Damage	3. OTHER PROPERTY DAM- AGE	4. ITEMS DAMAGED			
G.	\$ 1. Commodity being transpor-	2. Estimated loss due to 3.	V fo 1160 :	[4 W	5-3-15 Washington
General	ted at time of accident	accident	Year facility instal- ed (excluding pipe)	4. Was there a	fire? 5. Was there an explosion?
Instruc-	Answer sections H, I or J o	Berrels nly if they apply to the parti	cular accident be		
H.	1. Nominal 2. Well 3. Go Thickness		20-30	5. Condition Installed	When 6. Type of Joint Weld Coupled
Occurred	in. in. 7. Configuration at Point of Accident	After 1935 (specify yr.	3	New Reconditi	9. Pipe Was
in Line Pipe	Straight Sag		bend Pressure at time &	Conted Not Coat location of	13. Had there been a pressure
	in. 14. If 13. Is Yes, Medium Used	psig 15.	Duration of Test	psig 16. Maximum	test on system? No 17. Date of Latest Test
	and the second s				
	Water Petroleum	Air	Hrs.	Test Pressure psig	11-108 S, 9-83

Submit two copies of DOT Form F 5800.1 to:

United States Department of Transportation Transportation Programs Bureau Chief, Information Systems Division Washington, DC 20590

Excess Air Emissions:

Refer to notes.

Notes:

- 1. Releases of hazardous air pollutants are subject to the same reporting requirements as hazardous wastes above.
- 2. "Exception": Hazardous air pollutant releases covered by NESHAP semiannual and special reporting requirements.
- 3. The only applicable special reporting requirement under NESHAP is for "Vinyl Chloride" relief valve discharges. Within 10 days of any relief valve discharge (except for emergency relief discharge), a written report must be submitted to the appropriate EPA Regional Administrator and include the following:

Submit to:

Refer to map for regional offices.

The written submission shall include:

- a. Source, nature, and cause of discharge.
- b. Date and time of discharge.
- c. Estimated vinyl chloride loss.
- d. Method of estimation.
- e. Action to prevent discharge.
- f. Measures adopted to prevent future discharges.

Water Discharge Excursions:

Report any excursion (noncompliance) which may endanger health or the environment within 24 hours of becoming aware of the circumstances to the appropriate EPA Regional Administrator (refer to map). A written submission shall also be provided within 5 days of becoming aware of the circumstances.

Notes:

- 1. The following shall be included as information which must be reported within 24 hours:
 - a. Any unanticipated "bypass" which exceeds any effluent limitation in the NPDES permit.
 - b. Any "upset" which exceeds any effluent limitation in the NPDES permit.
 - c. Violation of a maximum daily discharge limitation for any pollutants listed in the NPDES permit to be reported within 24 hours.
- 2. "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility.

- 3. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, lack of preventive maintenance, or careless or improper operation.
- 4. The written submission shall be submitted to and include the following: Submit to:

Refer to map for regional offices.

The written submission shall include:

- a. Description of the noncompliance and its cause.
- b. Period of noncompliance, including exact dates and times.
- c. If the noncompliance has not been corrected, the anticipated time it is expected to continue.
- d. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
- 5. The Regional Administrator may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

Notes:

- "Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment.
- "Environment" means all surface and ground water, land surface, or subsurface strata and ambient air within the United States or under the jurisdiction of the United States.
- 3. A hazardous waste generator is exempt from having to file a written 15-day incident report as long as he or she is engaged in treatment or containment activities during an immediate response to (1) a discharge of a hazardous waste, (2) an imminent and substantial threat of a discharge of hazardous waste, and/or (3) a discharge of a material which, when discharged, becomes a hazardous waste.

Hazardous Materials:

Report transportation-related (including loading, unloading, and temporary storage) incidents in which as a direct result of "hazardous materials" the following occurred to:

United States Coast Guard, Washington, DC

National Response Center

(24-hour)

(800) 424-8802

(24-hour)

(202) 426-2675

Notes:

- 1. "Hazardous materials" are listed under 49 CFR 172.101.
- 2. Report incidents in which
 - a. A person is killed.
 - b. A person receives injuries requiring his hospitalization.
 - c. Estimated carrier or other property damage exceeds \$50,000.
 - d. Fire, breakage, spillage, or suspected radioactive contamination occurs involving shipment of radioactive material.
 - A situation exists of such a nature that, in the judgement of the carrier, it should be reported, even though it does not meet the criteria of a. through c.
- 3. Reports must include the following:
 - a. Name of the reporter.
 - b. Name and address of carrier represented by reporter.
 - c. Phone number where reporter can be contacted.
 - d. Date, time, and location of incident.
 - e. The extent of injuries, if any.
 - f. Classification, name, and quantity of hazardous material involved, if such information is available.
 - g. Type of incident and nature of hazardous material involvement and whether a continuing danger to life exists at the scene.
- Each carrier that has a reportable hazardous material incident shall report in writing in duplicate on the following DOT Form F 5800.1 within 15 days of the date of discovery of each incident.

- c. Resulted in gas igniting.
- d. Caused estimated damage to the property of the operator or others, or both, of a total of \$5,000 or more.
- e. In the judgement of the operator was significant, even though it did not meet the criteria of a through d. above.
- 3. An operator need "not" report a leak that met 2.b. or 2.c. if it occurred solely as a result of, or in connection with, planned or routine maintenance or construction.
- 4. Reports must include the following:
 - a. The location of the leak.
 - b. The time of the leak.
 - c. The fatalities and personal injuries, if any.
 - d. All other significant facts that are known by the operator that are relevant to the cause of the leak or extent of the damages.
- 5. Each operator that has a reportable leak shall, as soon as practicable but not later than 20 days after detection, file a leak report on the following DOT Form F-7100.2.

Submit DOT Form F-7100.2 to:

United States Department of Transportation Transportation Programs Bureau Chief, Information Systems Division Washington, DC 20590

Hazardous Substances:

Report any release equal to or exceeding the "reportable quantity" in any 24-hour period to:

United States Coast Guard, Washington, DC

National Response Center

(24-hour)

(800) 424-8802

In Hawaii, Alaska, and the Washington, DC, metropolitan area, report to:

United States Coast Guard, Washington, DC

National Response Center

(24-hour)

(202) 426-2675

Note: "Reportable quantities" of hazardous substances can be found under 40 CFR 117.3 (Table 117.3). It should be noted that EPA plans to promulgate a revised list of hazardous substances and reportable quantities in April or May 1984.

Hazardous Wastes:

Report any "release" from a treatment, storage, or disposal facility equal to or exceeding "one pound" into the "environment" to:

United States Coast Guard, Washington, DC

National Response Center

(24-hour)

(800) 424-8802

(24-hour)

(202) 426-2675

Notes:

- "Hazardous liquid" means petroleum, petroleum products, and anhydrous ammonia.
- 2. Report any failure that
 - a. Caused a death or a personal injury requiring hospitalization.
 - b. Resulted in either a fire or an explosion not intentionally set by the operator.
 - c. Caused estimated damage to the property of the operator or others, or both, exceeding \$5,000.
 - d. Resulted in pollution of any stream, river, lake reservoir, or other similar body of water that violated applicable water quality standards, caused a discoloration of the surface of the water or adjoining shoreline, or deposited a sludge or emulsion beneath the surface of the water or upon adjoining shorelines.
 - e. In the judgement of the operator was significant, even though it did not meet the criteria of a. through d. above.
- 3. Reports must include the following:
 - a. Name and address of the operator.
 - b. Name and telephone number of reporter.
 - c. Location of the failure.
 - d. Time of the failure.
 - e. Fatalities and personal injuries, if any.
 - f. All other significant facts known by the operator that are relevant to the cause of the failure or extent of the damages.
- 4. Each operator that has a failure that is required to be reported shall, as soon as practical but not later than 15 days after discovery of the failure, file an accident report on the following DOT Form 7000-1.

Submit two copies of DOT Form 7000-1 to:

United States Department of Transportation

Transportation Programs Bureau Chief, Information Systems Division Washington, DC 20590

Report any leak in a "gas" pipeline resulting in any of the following (see notes) to:

United States Department of Transportation, Washington, DC Office of Pipeline Safety

(24-hour)

(202) 426-0700

(Otherwise)

(800) 424-8802 (National Response Center)

Notes:

- 1. "Gas" means natural gas, flammable gas, or gas which is toxic or corrosive.
- 2. Report any leak that
 - a. Caused a death or a personal injury requiring hospitalization.
 - Required the taking of any segment of transmission pipeline out of service.

Oil:

Report spills into or upon the "navigable waters of the United States" or adjoining shorelines to:

United States Coast Guard, Washington, DC

National Response Center

(24-hour) (800) 424-8802 ·

- 1. "Navigable waters of the United States" include all surface waters.
- 2. The spill report shall include:
 - a. Time of the spill.
 - b. Identity of the material spilled.
 - c. Approximate quantity spilled.
 - d. Location and source of the spill.
 - e. Cause and circumstances of the spill.
 - f. Existing or potential hazards (fire, explosion, etc.), if any.
 - g. Personal Injuries or casualties, if any.
 - h. Corrective action being taken and an approximate timetable to control. contain, and clean up spill.
 - Name(s) and telephone number(s) of individual(s) who discovered and/ or reported the spill.
 - j. Other unique or unusual circumstances.
- 3. Facilities required to have a Spill Prevention Control and Countermeasure (SPCC) Plan that have a spill in excess of "1000 U.S. gallons" in a single event or have two spill events within any 12-month period into or upon "navigable waters of the United States" or adjoining shorelines shall submit to the appropriate EPA Regional Administrator within 60 days from the time the facility becomes aware of the spill the following:
 - a. Name of the facility.
 - b. Name(s) of the owner or operator of the facility.
 - c. Location of the facility.
 - d. Date and year of initial facility operation.
 - e. Maximum storage or handling capacity of the facility and normal daily throughput.
 - f. Description of the facility, including maps, flow diagrams, and topographical maps.
 - g. A complete copy of the SPCC Plan with any amendments.
 - h. The cause(s) of such spill, including a failure analysis of system or subsystem in which the failure occurred.
 - i. The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements.
 - j. Additional preventive measures taken or contemplated to minimize the possibility of recurrence.
 - k. Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event.

Report any failure in a pipeline system in which there is a release of a "hazardous liquid" resulting in any of the following (see notes) to:

United States Department of Transportation, Washington, DC Office of Pipeline Safety

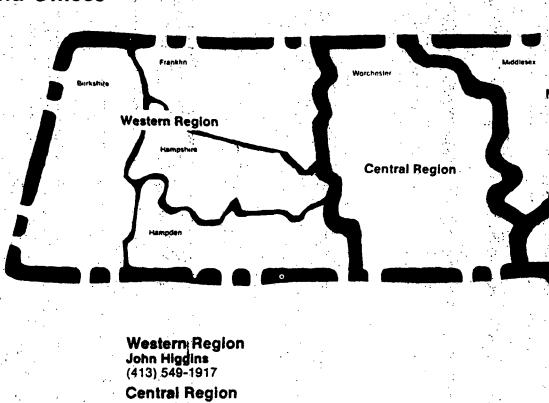
(24-hour)

(202) 426-0700

(Otherwise)

(800) 424-8802 (National Response Center)

Massachusetts
Department of Environmental
Quality Engineering
Regional Boundaries
and Offices



Central Region Gilbert Joly (617) 727-3265

Northeast Region William St. Hilaire (617) 935-2160

Southeast Region Paul Anderson (617) 947-1231



Hazardous Materials:

Same as Hazardous Wastes.

Excess Air Emissions:

No immediate reporting requirements.

Water Discharge Excursions:

Report excursions (noncompliance) within 24 hours followed by a written report within 5 days to:

Massachusetts Department of Environmental Quality Engineering, Boston

Water Pollution Control Division

(Office hours) (617) 292-5673

And to:

Western Regional Office (413) 549-1917 Central Regional Office (617) 727-3265 Southeast Regional Office (617) 935-1231 Northeast Regional Office (617) 947-2160

Notes:

- 1. The verbal shall include:
 - a. Description of the noncompliance.
 - b. Date and time.
 - c. Situation has been corrected.
 - d. Situation will continue until and is expected to be corrected.
 - e. Steps taken to prevent recurrence.
- 2. The written report shall describe the incident and be submitted to:

Massachusetts Department of Environmental Quality Engineering Water Pollution Control Division

1 Winter Street

Boston, MA 02108

Oil:

Same as Hazardous Wastes.

Hazardous Substances:

Same as Hazardous Wastes.

Hazardous Wastes:

Report any imminent or actual emergency to:

Massachusetts Department of Environmental Quality Engineering, Boston

Hazardous Waste Division

Office of Incident Response (9 to 5) (617) 292-5648

(Otherwise) (617) 566-4500 (State Police)

Notes:

- If the facility has had a fire, explosion, or other release which could threaten
 public health, safety or welfare or the environment, the Conoco Emergency
 Coordinator shall immediately notify the above Department. The report
 shall include:
 - a. Name and telephone of individual reporting.
 - b. Name and address of the facility.
 - c. Time and type of incident (e.g., release, fire).
 - d. Name(s) and quantity of material(s) involved, to extent known.
 - e. Extent of injuries, if any.
 - t. Possible hazards to public health, safety, or welfare, or the environment outside the facility.
- 2. Within 15 days after the incident, a written report shall be filed with and include the following:

Submit to:

Massachusetts Department of Environmental Quality Engineering

Hazardous Waste Division

Office of Incident Response

5th Floor

1 Winter Street

Boston, MA 02108

The written report shall include:

- a. Name, address, and telephone number of the owner or operator and the facility.
- b. Date, time, and type of incident.
- c. Name and quantity of material(s).
- d. Extent of injuries, if any.
- e. Assessment of actual or potential hazards to public health, safety, welfare, or the environment.
- f. Estimated quantity and the disposition of recovered material that resulted from the incident.
- g. All differences between the emergency response activities actually taken and those prescribed in the contingency plan and the reasons for each such difference.
- h. Proposed measures to prevent similar incidents in the future.

GRACE MEMO

o: J. J. Cohenno

n: R: M: OLSon

bject: HAZARDOUS MATERIALS

3.50

date: April 26, 1985

c: R. P. Porter

R. P. Riolo

R. S. Brooks

J. S. Colageo

J. P. Nardelli

H. J. Gaffney

R. P. Elson

T. P. Cummings

Attached are the DEQE Spill Reporting Procedures for Hazardous Waste & Materials. Please read this and keep on file with your other Hazardous Materials Information.

Reminder: All incidences of spills are to be reported immediately to the Hazardous Waste Coordinator (John Cohenno).

R. M. Olson

RMO/dlg attachment Emerson & Cuming Page-2-

divert groundwater run-off away from the building, constructing dikes and berms around potential spill areas and chemical storage areas and in general, better housekeeping procedures.

It was observed during the inspection that all of the above has been completed and that on-going improvements will continue to address the elimination of potential releases to the East Branch River. The Camp Dresser & McKee, Inc., report did reveal, as a result of their investigation, the discharge of non-contact cooling water i.e. steam condensate, air conditioning and a groundwater sump discharge to the raceway. These discharges will continue and an appropriate "NPDES" permit application has been made to EPA which was acknowledged by them in writing on June 13, 1984.

It is the Department's opinion that Emerson & Cuming has acted in good faith and has taken all appropriate steps as requested. The Department would like to extend its appreciation to you for your cooperation and continued efforts in this matter.

If you have any questioning regarding this matter, you may contact Mr. David G. Erekson of my staff at 935-2160.

Very truly yours,

William C. F

William A. Krol, P.E.

Deputy Regional Environmental

Engineer

DGE/bc

cc: Canton Board of Health, 1492 Washington Street, Canton, Ma. 02021
Attention: Ms. Regina McCarthy
Department of Environmental Quality Engineering, Metropolitan Boston/
Northeast Region, 5 Commonwealth Avenue, Woburn, Ma. 01801
Attention: Richard Chalpin, Acting Regional Environmental Engineer
Department of Environmental Quality Engineering, Division of Hazardous
Waste, One Winter Street, Boston, Ma. 02108



The Commonwealth of Massachusetts Department of Environmental Quality Engineering Metropolitan Boston - Northeast Region 5 Commonwealth Avenue Woburn. Massachusetts 01801

935-2160

March 1, 1985

Emerson & Cuming
Dewey and Almy Chemical Division
W.R. Grace and Company
59 Walpole Street
Canton, Ma. 02021

RE: CANTON-"Spill Control Audit at Plant #2" Engineering Report

Attention: Mr. Randolph M. Olson, Plant Manager

Dear Mr. Olson:

On February 27, 1985, Engineers from the Metropolitan Boston/Northeast Region of the Department of Environmental Quality Engineering, Division of Water Pollution Control, met with you and Ms. Gina McCarthy of the Canton Board of Health to review and inspect the progress toward accomplishing the recommended actions contained in a report entitled:

"Emerson & Cuming Canton, Massachusetts Spill Control Audit

Plant No. 2"

The above report was prepared by Camp Dresser & McKee, Inc., and dated January, 1983. The report was requested in a letter from the Department, dated November 5, 1982 and was the result of an inspection of your facility at the above address on November 2, 1982. The inspection was conducted at the request of the Canton Board of Health to investigate the drainage patterns both inside and outside the plant as they related to any existing or potential discharge of pollutants to an existing raceway which flows under the building and property. The raceway is diverted from the East Branch River of the Neponset River and discharges back to the River through a 24 inch concrete pipe. The Board of Healths concern in this matter was the potential for any pollutants to reach the Town Wells downstream from your facility.

The inspection at that time did not reveal the presence of any existing discharges nor the appearance of any pollutants at the outfall pipe. However, the Department's letter did point out that due to the existance of the raceway, certain chemical storage and the use of these chemicals, or unauthorized use presented a potential discharge. Therefore; the Department recommended that some appropriate steps be taken to address this potential discharge.

As a result, the aformentioned report addressed these issues and made recommendations including, sealing the entrance to the raceway, sealing grates, trenches, drains and accesses from the plant, paving along Walpole Street, to

Town of Canton, Massachusetts





BOARD OF HEALTH MEMORIAL HALL 828-0615

March 4, 1985

Randy Olson, Plant Manager Emerson & Cuming - Plant No. 2 59 Walpole Street Canton, Ma. 02021

Dear Mr. Olson,

An inspection of your facility conducted on February 27, 1985 with representatives from D.E.Q.E. indicated that you have completed a great deal of work in response to recommendations outlined in the Spill Control Audit conducted in January, 1983. The remaining work to be completed involves the following action:

- 1. Clean and seal the trench in the small room ν behind the buoyancy testing area.
- 2. Provide a new hatch and screen at the discharge point into the raceway to prevent the escape of macroballoons.
- 3. Provide a sealed plate over the remaining sump. ν
- 4. Seal the pipe across from the open sump area which has an unknown discharge point.
- 5. Move outside empty barrels into the diked area.

In addition, you have indicated your intention to install a still to reclaim methylene chloride, when all necessary permits are obtained.

Once the above work is completed, and the sandblasting operation is brought into compliance, please contact me for a reinspection.

I wish to thank you for the efforts you have shown and look forward to your continued cooperation.

Sincerely

Porins X Madantha -

- 5. Shipping & Receiving will come and pick up the waste container (drum) within 24 hours from receiving the waste generation form.
- 6. Shipping & Receiving will inspect, log, relabel the container and place it in the Hazardous/Chemical Waste Storage area pending shipment.
- 7. The waste will then be shipped out <u>at minimum</u> within 90 days. It would be preferable to ship every 30-45 days.

See to it that you and your departments comply with these specific requirements. Use your departmental safety meeting next week to reeducate your people and see that they understand and follow these procedures. We will be following through on these details over the next month. Also, we will have a self inspection to be prepared for the actual RCRA inspection.

R. M. Olson

Distribution:

J. J. Cohenno

J. S. Colageo J. P. Nardelli

R. P. Porter

R. S. Brooks

R. P. Riolo

L. J. Patterson

H. J. Gaffney

R. P. Elson

M. Haddad

569U

GRACE: MEMO

to:

Distribution

date: May 14, 1985

from:

R. M. Olson

subject:

HAZARDOUS AND CHEMICAL WASTE GENERATION

As you know, we had a visitor last week from the DEQE regarding Hazardous Waste. Fortunately this was not a full fledged RCRA inspection. However, I expect a full inspection soon.

We must bring our procedures for generation and accumulation back up to good standards. Some of the key factors that need your attention are:

- 1. Each department area that generates chemical waste must have a clearly defined, marked and labelled area for collecting the chemical waste. IE Flotation Block, Flotation Module Pouring, Frac Ball, P2 Aft Casting, Absorber Solution & Paint Mixing, P2 Nosecap Assembly & Painting and Absorber Painting & Gluing.
- Waste must be collected in the appropriate <u>APPROVED</u> container required for the waste involved.
- 3. The empty container (drum) must be LABELLED with the material going into it, the date that the first drop went into it and the department name. This LABELLING must be done before the first drop goes in!
- 4. Upon a given container (drum) being filled and capped, a waste generation form must be filled out and forwarded to John Cohenno the same day!

GRACE MEMO

(5h)

mate: 9/21/82

10: Plant II Supervisors

from: R. M. Olson

Subject: Chemical Waste Removal & Empty Drum Removal

In response to Jay's memo of 9/7/82, there is not any action in progress to set up your departments' waste. Please provide me with a written plan to implement waste handling in your department(s) by October 1, 1982.

Empty drum disposal procedures are not being properly followed.

The system is:

- 1. Ensure drums are completely empty!
- 2. Empty drum must have bung cap in place.
- 3. An "EMPTY" drum label must be applied to the empty drum.
- 4. The empty drums <u>must</u> be palletized for removal to the yard.
- 5. Notify the Flotation supervisor that you have drums brought down to the nearest dock and ready to be stacked in the yard for pick up.
- 6. The Flotation supervisor will have his forklift driver move the <u>palletized</u>, empty drums to the yard.

R. M. Olson

dma





Cile 3480 Emerson & Cuming

Dewey and Almy Chemical Division W. R. Grace & Co. Canton, Mass. 02021

(617) 828-3300

March 21, 1983

Mr. Sabin Lord
D.E.Q.E.
323 New Boston Street
Woburn, Massachusetts 01801

Dear Mr. Lord:

This letter is to confirm that our company reported a chemical spill on Wednesday, March 16, per our phone conversation. We believe that approximately 80 gallons of Tertbutylstyrene leaked out of three punctured drums before the leaks were discovered and stopped at 1:30p.m. on March 16. This liquid flowed into the Neponset River about 15 feet away. Upon examination of the drums, the punctures seemed to be of suspicious origin. The matter is under investigation.

Regina McCarthy, the Town of Canton Health Agent, came to the spill location around 3:00p.m. on March 16. Emerson & Cuming cleaned up the contaminated earth and placed it into drums for hazardous waste disposal.

Should there be any further action required on our company's part, please notify us as soon as possible.

Sincerely,

Emerson & Cuming

Jay T. McNeff

Plant Engineer

EMPTY DRUM HAZARDOUS MATERIAL SHIPPING FORM



	CONSIGNEE and DESTINATIO
Emerson & Cummings	SERVICE CHEMICAL CORPO 22.1 SUTTON STREET NO. ANDOVER, MA. 01845 TEL: (617) 685-2121
PANton	NORTH EAST SOLVENTS CO 221 SUTTON STREET NO. ANDOVER, MA. 01845

ļ	CONSIGNEE and DESTINATION (CHECK BOX)	
.	SERVICE CHEMICAL CORPORATION	
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"This is to certify that the above-named materials are properly classified, described, packaged, marked and labelled, and are proper condition for transportation according to the applicable regulations of the Department of Transportation."

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WHITE - OFFICE COPY CANARY - CHISTOMER'S COPY

North East Solvents Corp. 21300 CREDIT MEMO 221 SUTTON STREET NO. ANDOVER, MASS. 01845 NO 5950 TEL. (617) 683-1002 Emerson & Cuming 59 Walpole St TO Canton, MA 02021 Attention: Accounts Payable APPROVED CUST. ORDER NO. DATE OUR INVOICE NO. SALESMAN _3/31/86 33676 Empty Drum Meturn AMOUNT QUAN. PRICE WE CREDIT YOUR ACCOUNT Drum Deposits Returned 120 00 20./ea

CREDIT MEMORANDUM

OFFICE COPY

EMPTY DRUM HAZARDOUS MATERIAL SHIPPING FORM



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Canton ma	NORTH EAST SOLVENTS CORPORATION 221 SUTTON STREET NO. ANDOVER, MA. 01845 TEL. (617) 683-1022

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EMPTY DRUM HAZARDOUS MATERIAL SHIPPING FORM

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CREDIT MEMO

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Emerson & Curming 59 Walpole St. Canton, MA 02021

Attn: Accounts Payable

APPROVED

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GRACE MEMO

G. F. Winterson

date:

January 12, 1984

from

R. M. Olson

cc:

W. A. Mischel J. T. McNeff

subject:

Canton Health Department Gina McCarthy

Gina McCarthy of the Canton Health Department visited plant 2 today. She met with Jay McNeff and myself to primarily review and follow up the CDM survey and proposals presented to the DEQE last January 1983. Overall, Gina was pleased and impressed with our action and progress related to the situation.

Gina indicated that she had followed up with the DEQE over the past year and got little response. This is consistent with my finding. I have called the DEQE several times during the year (latest call was November 1983) and gotten no response. The most I found out was that they had gotten the report but haven't read it yet.

Gina, Jay and I reviewed each of the items on my memo to DEQE and the CDM report. We then walked through the plant and looked at each area and item to verify status. All items have been completed with the exception of the following:

- Seal entrance to raceway at the viaduct. We are waiting for the contractor to complete (weather problems) Estimate April completion.
- 2. Finish sealing the remaining floor drains and trenches. A shop order for \$5,000 has been routed. Estimate completion to be end of February.

Gina will be formally requesting water sampling at the discharge end of the raceway after we complete the above work. She feels that the tests are necessary to "wrap-up" the matter and satisfy the Health Department that we are not contributors to Canton well water contamination. Her primary interest relates to fluorocarbons.

R. M. Olson

REDACTED - CONFIDENTIAL BUSINESS INFORMATION

WR/IP-2103

JUN 13 1984

Randolph M. Olson, Plant Manager Emerson & Cuming 59 Walpole Street Canton, MA 02021

Re: NPDES Application No.

Dear Mr. Olson:

Your application for a National Pollutant Discharge Elimination System (NPDES) permit has been reviewed and appears to be complete. You may be contacted for additional information as the permit is developed, should it be necessary to clarify, modify or supplement any previously submitted information. By copy of this letter, your State Water Pollution Control Agency is being furnished a copy of your complete application for certification pursuant to Section 401(a)(1) of the Clean Water Act, as amended, 33 U.S.C §1341(a)(1).

A draft permit and statement of basis or fact sheet will be prepared by this office and forwarded to you for comment prior to the opening of the public comment period. The draft permit will then be publicly noticed and forwarded for state certification if certification has not previously been received on the application. If it is deemed necessary, a public hearing will be held, in which case, the comment period will be extended until the close of the hearing. After the close of the public comment period, your final permit will be issued providing no new substantial questions are raised. If new questions develop during the comment period, it may be necessary to draft a new permit, revise the statement of basis or fact sheet and/or reopen the public comment period.

The waiver of testing requirements requested in your letter of May 8, 1984 for Outfall 001 has been granted for the following parameters: BOD, COD, TOC, TSS and Ammonia.

Should you have any questions concerning the permit issuance process, don't hesitate to contact Nanci Siciliano, of my staff. She may be reached at 617/223-3940.

Singerely volrs,

Edward K. McSweeney, Chief Compliance Branch

cc: State Water Pollution Control Agency w/encl.

REFERENCE NUMBER E+C PURCHISE ORDER # J-49405

On this 7th day of March 1984, the parties, Emerson and Cuming a Reduce Head Connection with its principal offices at 1114 Avenue of the American All Connection with the principal offices at 1114 Avenue of the American corporation with its principal offices at 1114 AVENUE OF THE AMERICALS NEW YORK, MY 10036 (hereinafter called "Generator"), and Chemical Waste Management, Inc., a Delaware corporation with its principal offices at 3003 Butterfield Road, Oak Brook, Illinois 60521, (hereinafter referred to as "Disposer"), have agreed as follows:

- WASTE MATERIALS. During the term of this Agreement, Generator will provide to Disposer Generator's entire output of certain waste materials generated at Emerson and Cuming, Canton, Massachusetts, (up to a maximum of one load per one time), the chemical composition and physical characteristics of which materials are described in the "Generator's PCB Waste Material Description Sheet", Code designation Reference Number 0.82566, attached hereto, and incorporated herein. PREVIOUSLY SUBMITTED NUMBER
- 2. DISPOSER SERVICES. Disposer agrees to provide Generator the following services, as described in one or more of the following sections:
- Transportation of (2) two five gallon pails containing PCB liquid (greater than 500 ppm) from Emerson and Cuming, Canton, Massachusetts to the disposal facility as listed in Section b. following.
- b. Transportation and disposal of the PCB liquid containing more than 500 ppm, in a manner permitted by law, at the following facility: MT "Vulcanus", Ocean Incineration Vessel, at the U.S.E.P.A. designated burn site.
- 3. FEES AND BILLING. For those services provided by Disposer, Generator will pay Disposer a fee as follows:

Transportation and disposal of (2) two five gallon pails containing PCB liquid (greater than 500 ppm)......\$150.00

Chemical Waste Management, Inc., will not accept any PCB materials for incineration which have been in storage for disposal by Generator for more than six months at the time of delivery to Chemical Waste Management, Inc.

The fees set forth are subject to change at any time during the term hereof upon Disposer providing Generator with at least thirty (30) days advance written notice.

The fee stated above shall be increased to include any amounts which Disposer is required to pay to local, state or Federal governments or agencies by virtue of a tax, tariff, fee, surcharge or other charge on the transportation, storage, treatment or disposal of the described waste materials. Such amounts will be invoiced to the Generator as a separate item on monthly statements. Disposer shall submit statements to Generator which shall be paid not later than thirty (30) days from date of receipt. Disposer shall retain copies of statements for at least five (5) years, as a record of disposal.

4. TERM. This Agreement shall have a term of one year from the date hereof, unless some shorter period is hereafter entered: May 7, 1984. Either party may terminate this Agreement, with or without cause, upon thirty (30) days' written notice to the other party.

5. TRANSFER OF WASTES AND TITLE. Generator's waste materials, so described, will be transferred to Disposer at the following place, times, frequencies and quantities.

Emerson and Cuming Canton, Massachusetts

As scheduled between the parties.

During normal business hours Monday thru Friday excluding legal holidays.

At the time Disposer takes possession of, and removes, waste materials from the place of transfer, or at the time Disposer accepts delivery of the waste materials at the designated storage or disposal facility, whichever circumstance is applicable, title, risk of loss and all other incidents of ownership to the waste materials shall be transferred from Generator and vested in Disposer.

In the event waste materials are discovered to be nonconforming, Disposer may revoke its acceptance of the materials. A justified revocation of acceptance shall operate to revest title, risk of loss and all other incidents of ownership in Generator, at the time revocation is communicated to Generator. Waste materials shall be considered nonconforming, for purposes of this Agreement: (i) if they are not in accordance with the descriptions, limitations or specifications stated in the attached Waste Material Description Sheet; or (ii) if they have constituents or components, not specifically identified in the Generator's PCB Waste Material Description Sheet, (a) which increase the nature of extent of the hazard and risk undertaken by Disposer in agreeing to handle, load, transport, store, treat or dispose of the waste materials, or (b) for whose storage, treatment or disposal the Disposal Facility is not designed or permitted.

Waste Materials discovered by Disposer to be nonconforming, if they are in Disposer's possession, shall be prepared for lawful transportation and returned to Generator within a reasonable time, not to exceed seven days, after notice of revocation of acceptance has been communicated to Generator, unless within such time, the parties agree to some alternative lawful manner of materials disposition. Generator shall pay Disposer its reasonable expenses and charges for handling, loading, preparing, transporting, storing and caring for nonconforming waste materials returned to Generator under this paragraph.

- 6. DISPOSER WARRANTIES. Disposer warrants that: it understands the currently known hazards which are presented to persons, property and the environment in the transportation, storage and disposal of the described waste materials; it will transport, store and dispose of such materials in full compliance with all governmental laws, regulations and orders; the storage and disposal facilities above described are now licensed and permitted to store and dispose of waste materials within the description of Paragraph 1: and, in the event the storage or disposal facility loses its permitted status hereafter during the term of this Agreement, disposer will promptly notify Generator of such loss.
- 7. GENERATOR WARRANTIES. Generator warrants that: the description of its waste materials, made in Paragraph 1, is true and correct; waste materials to be transferred to Disposer will conform to such description; containers of waste materials transferred to Disposer will be marked, labeled and otherwise in conformance with governmental laws, regulations and orders; he holds clear title to all waste materials to be transferred hereunder; he is under no legal restraint or order which would prohibit transfer of possession or title to such materials to

Disposer for transportation and storage or disposal; he has, and will during the term hereof, communicate to Disposer those hazards and risks known or learned by the Generator to be incident to the handling, transportation, storage and disposal of the waste materials; if the waste materials are hazardous wastes as defined pursuant to Section 3001 of the Resource Conservation and Recovery Act, the Generator has made any notifications required by Section 3010 of that Act and the Generator will comply with pertinent regulatory requirements established pursuant to Section 3002 of that Act, including the manifest requirement; he will comply with the relevant requirements of 40 CFR, Part 761: if the waste materials are, or contain, hazardous substances as defined pursuant to Section 101 (14) of the Federal Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Generator will advise Disposer, in writing, prior to tendering or delivering to Disposer any vehicular load of waste materials containing a reportable quantity of any hazardous substances or substances pursuant to Section 102 of said Act, specifying those hazardous substances present in a reportable quantity.

8. INDEMNIFICATION. Disposer agrees to indemnify, save harmless and defend the Generator from and against any and all liabilities, claims, penalties, forfeitures, suits, and the costs and expenses incident thereto, (including costs of defense, settlement and reasonable attorneys' fees), which it may hereafter incur, become responsible for or pay out as a result of death or bodily injuries to any person, destruction or damage to any property, contamination of or adverse effects on the environment, or any violation of governmental laws, regulations or orders, caused, in whole or in part, by (i) Disposer's breach of any term or provision of this Agreement; or, (ii) any negligent or willful act or omission of the Disposer, its employees or subcontractors in the performance of this Agreement.

Generator agrees to indemnify, save harmless and defend the Disposer from and against any and all liabilities, claims, penalties, forfeitures, suits, and the costs and expenses incident thereto, (including costs of defense, settlement and reasonable attorneys' fees), which it may hereafter incur, become responsible for or pay out as a result of death or bodily injuries to any person, destruction or damage, to any property, contamination of or adverse effects on the environment, or any violation of governmental laws, regulations or orders, caused, in whole or in part, by (i) Generator's breach of any term or provision of this Agreement; or, (ii) any negligent or willful act or omission of the Generator, its employees or subcontractors in the performance of this Agreement.

9. INSURANCE. Disposer shall procure and maintain, at its expense, during the term of this Agreement, at least the following insurance, covering activities, performed under, and contractual obligations undertaken in this Agreement:

	COVERAGE	LIMITS
(a)	Workmen's Compensation	Statutory
(b)	Employer's Liability	\$500,000 each occurrence
(c)	Public Liability (bodily injury)	\$5,000,000 combined single limit
(d)	Public Liability (property damage)	Same as (c) above

(e) Automobile Liability (bodily injury)

\$200,000 each person \$500,000 each occurrence

(f) Automobile Liability (property damage)

\$50,000 each occurrence

Disposer agrees to furnish insurance certificates, showing Disposer's compliance with this Section, upon written request of the Generator.

- 10. WORK ON GENERATOR'S PREMISES. Generator agrees to provide Disposer, its employees and subcontractors a safe working environment for any work, in performance of this Agreement, which must be undertaken on premises owned or controlled by the Generator. Disposer, its employees and subcontractors shall comply with the Generator's safety procedures while on the Generator's premises, provided such procedures are conspicuously and legibly posted in the working area or have been delivered, in writing, to Disposer prior to the commencement of work on the Generator's premises.
- 11. INDEPENDENT CONTRACTOR. Disposer is and shall perform this Agreement as an independent contractor, and as such, shall have and maintain complete control over all of its employees, agents, and operations. Neither Disposer nor anyone employed by it shall be, represent, act, purport to act or be deemed to be the agent, representative, employee or servant of the Generator.
- 12. INSPECTIONS. The Generator shall have the right to inspect and obtain copies of all written licenses, permits or approvals, issued by any governmental entity or agency to Disposer or its subcontractors which are applicable to the performance of this Agreement; to inspect and test, at its own expense, transportation vehicles or vessels, containers or disposal facilities provided by Disposer; and to inspect the handling, loading, transportation, storage or disposal operations conducted by Disposer in the performance of this Agreement. Such inspections are encouraged by Disposer.
- 13. EXCUSE OF PERFORMANCE. The performance of this Agreement, except for the payment of money for services already rendered, may be suspended by either party in the event the delivery or transportation of the described waste materials by Generator, or transportation, storage or disposal of such materials by Disposer are prevented by a cause or causes beyond the reasonable control of such party. Such causes shall include, but not be limited to, acts of God, acts of war, riot, fire, explosion, accident, flood, or sabotage; lack of adequate fuel, power, raw materials, labor or transportation facilities; governmental laws, regulations, requirements, orders or actions; breakage or failure of machinery or apparatus; national defense requirements; injunctions or restraining orders; labor trouble, strike, lockout or injunction (provided that neither party shall be required to settle a labor dispute against its own best judgment).
- 14. DELEGATION AND ASSIGNMENT. Disposer may at any time, upon written notice to the Generator, delegate, orally or in writing, the performance of the work, or any portion thereof, which is by this Agreement undertaken by Disposer; provided, however, Disposer may not, without the prior written consent of Generator, cause the storage or disposal of the waste materials at any facility other than those specified in Section 2 (b) of this Agreement. Any such delegation shall not operate to relieve Disposer of its responsibilities hereunder and, notwithstanding any such delegation, Disposer shall remain obligated to the Generator in these undertakings.

CHEMICAL WASTE MANAGEMENT, INC.

GENERATOR'S PCB WASTE MATERIAL DESCRIPTION SHEET

Reference Number <u>E+C</u> Po#2-49405

Transportation and disposal of (2) two five gallon pails containing PCB liquid (greater than 500 ppm).

PCB LIQUIDS

PCB liquids must be contained in DOT 17E drums according to EPA specifications, or shipped in bulk, 2,000 gallons or more.

For the incineration of PCB liquids containing greater than 500 ppm PCB and/or a flash point less than 140° F., please send any analytical data to Chemical Waste Management, Inc. prior to shipment.

All containers must be labeled in accordance with the Toxic Substance Control Act, PL 94-469, Subpart "C" and the Federal Register (49 CFR, Part 172.316).

NOTE: In accordance with U.S.E.P.A. regulations, all materials designated for disposal must have notation on the container indicating the date the materials were placed in storage.

CONTRACT	NO.	COL

PROPOSAL ANALYSIS FORM/BILLING FORM

CWM DISPOSAL BILLING LOCATION:	CWM TRANSPORTATION BILLING LOCATIO
Emelle, Al Kansas City, MO WHILE MA	Emelle, Al Kansas City, MO (LEAN HARISORS, INC. X
SHIPPING NAME & ADDRESS:	BILLING NAME & ADDRESS:
same	EMERSON AND CUMING
	59 WALPOLG STREET
ZIP	CANTON, MA ZIP 02021
CONTACT:	CONTACT: JAY NO NEEP
PHONE:	PHONE:
WASTE TYPE QUANTITY	PRICING
CAPACITORS, Small (less than 3 lbs.) Landfill	crat dru
CAPACITORS, Large	crat dru
PCB Liquid (less than 500 ppm) for LANDFILLING	bu dru
(2) 5 GAL PAILS PCB	LIQUID (OVER 500 ppm) bu dru dru dru dru
X PCB Liquid \$150.00	lump sum dru
PCB ARTICLES (Soil, rags, clothing, debris, etc.)	DISBSAC
TRANSFORMERS - Drained & Flushed	/cu. f
TRANSFORMER - Turnkey Service (See Other Side)	
OTHER	
ADDITIONAL PRICING INCLUDED IN ABOU	NE PRICE miles =/large truck small tru-
	arting upon arrival at Generator's facility. All time : age and charged at a rate of \$ 60 -(70) per hou:
	led \$/ton (For material to be landfilled
**************************************	? - 0°U ***********************************
PROJECTED ANNUAL VOLUME	ACTION REQUESTED
SPECIAL INSTRUCTIONS	
B. d. N.;	APPROVED BY KKIVELLE
SUBMITTED BY 1 NCT MYCC CREDIT CHECK 15	APPROVED BY 1. KUVLER 3/5/E4

Either party may, at any time, upon written notice to the other party, assign its rights under this Agreement.

15. NOTICE. Any notice to be given under this Agreement shall be in writing and delivered to the address of the respective party below:

GENERATOR:

DISPOSER:

Emerson and Cuming 59 Walpole Street Canton, Massachusetts 02021 Attn: Mr. Jay McNeff Chemical Waste Management, Inc. Five Strathmore Road Natick, Massachusetts 01760 Attn: Bred Dyer

- 16. LAW TO APPLY. The validity, interpretation and performance of this Agreement shall be governed and construed in accordance with the laws of Alabama.
- 17. ENTIRE AGREFMENT. This Agreement represents the entire understanding and agreement between the parties hereto relating to the transportation, storage, treatment, processing and disposal of the described waste materials and supersedes any all prior agreements, whether written or oral, that may exist between the parties regarding same and supersedes any and all terms and conditions which may be contained in any purchase orders, issued by the Generator prior or subsequent to this Agreement.

In no event shall the preprinted terms or conditions found on any Disposer or Generator purchase or work order be considered an amendment or modification of this Agreement, even if such documents are signed by representatives of both parties; such preprinted terms or conditions shall be considered null and of no effect.

IN WITNESS WHEREOF, the parties have caused this Agreement to be executed by their duly authorized representatives as of the day and year first above written.

GENERATOR:

EMERSON	AND	CUMING
----------------	-----	--------

By: John J. The Rell I
Title: PLANT ENGINEER
DISPOSER:
CHEMICAL WASTE MANAGEMENT, INC.

George M. Simmons

Title: Region Manager

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I.

CANTON, MASSACHUSETTS

The property in Canton, Massachusetts consists of two basic facilities, sometimes referred to below as Plant #1 and Plant #2.

Plant #1 is located at 869 Washington Street, Canton, Massachusetts, on a parcel of land containing approximately acres. Plant #1 consists of 7 essentially separate buildings, which are generally described as follows:

Building 1: This building is used for manufacturing and maintenance purposes, consists of a basement and one story above grade (each floor containing approximately 4,700 sq. ft.) and is of brick, stone and wood construction.

Building 2: This building is used for maintenance and storage, consists of one story of approximately 3,300 sq. ft. and is of concrete block and wood construction.

Building 3: This building is used for offices, laboratories and storage, consists of a basement and one story above grade (each floor containing approximately 5,700 sq. ft.) and is of wood, stone and brick construction.

Building 4: This building is used for manufacturing, consists of one story of approximately 525 sq. ft. and is of poured concrete, concrete block and steel sheeting construction.

Building 5: This building is used for manufacturing, storage and shipping, consists of a basement and three stories above grade (each floor containing approximately 4,200 sq. ft.) and is of stone, brick and wood construction.

Building 6: This building is used for offices and storage, consists of a basement and two stories above grade. The basement contains approximately 5,500 sq. ft. and there is a total of approximately 9,700 sq. ft. above grade. The building is of reinforced concrete, concrete block and steel construction.

Building 7: This building is used for manufacturing, consists of one story of approximately 2,700 sq. ft. and is of concrete, stone, brick, concrete block and wood construction.

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Plant #2 is located at 59 Walpole Street, Canton, Massachusetts, on a parcel of land containing approximately acres. Plant #2 consists of 6 essentially separate buildings, which are generally described as follows:

Building 1: This building is used for offices, consists of a basement and 2½ stories above grade (each floor containing approximately 2,200 sq. ft.) and is of stone, concrete, steel, wood and stucco construction.

Building 2: This building is used for offices, consists of two stories, contains approximately 3,000 sq. ft. above the basement level, and is of concrete, steel, concrete block and brick construction.

Building 3: This building is used for manufacturing, consists of a basement and three stories above grade, and contains approximately 3,400 sq. ft. in the basement and 51,900 sq. ft. above grade. It is of stone, wood and concrete construction.

Building 4: This building is used for manufacturing and the boiler house. It is in part a one story building and in part a two and one-half story building. The total floor area above the basement level contains approximately 24,200 sq. ft. The building is of stone, wood and brick construction.

Building 5: This building is used for manufacturing, consists of a basement and 2½ stories above grade, and contains approximately 15,000 sq. ft. in the basement and 34,500 sq. ft. above grade. It is of stone, wood and concrete construction.

Building 6: This building is used for laboratory testing, consists of a basement and one story and contains approximately 5,800 sq. ft. above grade. It is of concrete, brick and wood construction.

The land on which Plants 1 and 2 is located consists of multiple parcels. The deeds in to Emerson & Cuming described the various parcels as follows:

Deed recorded in Book 3130, Page 184:

and buildings thereon a certain parcel of land/in the Town of Canton, Norfolk County, Commonwealth NKARACKERENEERING (2.1). of Kassachuselts, being bounded and described as follows:

The first, "Parcel A", Beginning at the southwesterly corner of the premises on the casterly lide of Washington Street, now or formerly owned by George H. Lawless; and running

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NORTHEADTELLY along land now or formerly of James a. Desnis, two hendred ten (210) feet to a corner; then turning and rouning

NORTHWENTERLY along other land now or formerly of said Lawless about ninety-five (95) feet to a corner; then turning and running

SOUTHWESTERLY along parcel "B" and along the northwesterly face of the brick Building on rarcel "A" about two humbred five (205) feet to land of said James W. Lennis and a corner; then turning and running

SOUTHEASTERLY along land of said Dennis about Fighty-five (55) feet to the point of beginning and containing about seventeen thousand nine hundred and nine (17,909) equare feet.

The second, "Parcel D": Beginning at the northwesterly corner of the above described "Parcel A" and running

NURTHWESTERLY along other land now or for only owned by the Tobe
Deutschmann Corporation of Norwood, Massachusetts,
about forty-five (h5) feet to a corner; then turning
and running

SOUTHWESTERLI about seventy-five (75) feet to a corner; then turning end running

SOUTHEASTERNI about twenty-five (25) feet to the northwesterly face of the concrete building on 'Tarcel E" and a corner; then turning and running

**SOUTHWESTERLY along the northeasterly face of the said concrete building on "Parcel B" and partly along the contheasterly face of a building on other land new or forward commodity the Tobe Deutschmann Corporation of Norwood, Massachusetts, about fifty-five (55) feet to a corner; then turning end running

SOUTHEASTERLY about twenty-three (23) feet to the northwesterly face of the Brick Building on "Farcel A" and a corner; then twentng and running

RORTHEASTERN along the aforementioned northwesterly face of the brick Emilding on "rancelA" about a hundred and thirty (130) feet to the point of beginning and containing about Four thousand two hundred and fifty (1,250) square feet.

The third parcel "Parcel C" formerly known as the "Windmill Lot" on the northerly side of Sherman Street together with the easement and all rights thereto, all as shown on a plan made by Robert B. Bellamy, C.E., dated March 2h, 19h5, and entitled "Flan of an Hasement through land of James W. Dennis, Canton, Mass." and filed in the Norfolk County Registry of Deeds, Book 2562, Page 337.

Together with the rights and essements vested in the grantor for the maintaining and use of power lines, sanitary and storm sewers, and water lines as well as the rights in and over the passageways as shown on a plan entitled "Pian of Land in Canten, Mass., April 3, 1948, Nm. S. Growker, C.E., 46 Cornhill, Deston, Bassachusetts, and recorded at the Norfolk Registry of Deeds in Plan Book 145, rlan 250 of 1948.

being the same premises conveyed to me by deed of George H. Lawless of said Canton, dated June 18, 1949, and recorded in the Morfolk County Registry of Deeds on June 20, 1949, Book 2837, Page 57h.

Except so much thereof as was taken by the Town of Canton for the laying out of requit Street by instrument recorded July 20, 1950, in Norfolk Deeds, Book 2929, rage 510.

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Deed recorded in Book 3515, Page 529:

The land with the buildings thereon situate in Canton, Norfolk County, Massachusetts, shown as lots "A" and "B" on a Plan of Land in Canton, Mass., dated December 10, 1952, John P. Walsh. Civil Engineer, to be recorded herewith, said lots being together bounded

and described as follows:

Beginning at a point at the southwesterly corner of the premises herein conveyed at land of the grantor as shown on said plan, thence running Southeasterly by land of Walter S. Dennis as shown on said plan, 107.40 feet to a granite bound; thence turning and running.

[Description and encombrances, if any]

Northeasterly by land of the Canton Housing Authority as shown on said plan, 210 feet to a corner at land of the grantor; thence turning and running,

Northwesterly by land of said grantor, 140 feet to an iron pipe; thence turning and running,

Southwesterly 75 feet to an iron pipe at land of the grantor; thence turning and running,

Southeasterly 25 fect to the northwesterly face of the "one story concrete building" as shown on said plan; thence turning and running,

Southwesterly along the northwesterly face of said concrete building 34.60 feet; thence turning and running,

Southeasterly 90/100ths of a foot; thence turning and running

Southwesterly along the Northeasterly face of said concrete building, 37.10 feet; thence turning and running

Morthwesterly 2 feet; thence turning and running

Southwesterly 58.15 feet by land of said granter to land of said language and the point of isothering.

Together with the rights and easements to use the percel designated as "Proposed Passageway" shown on said plan recorded herewith, to enable the grantee and its successors and assigns to reach the existing passageway to Washington Street as shown on said plan.

Also, togother with the rights and easements vested in the granter for the maintaining and use of power lines, sanitary and storm sewers, and water lines as well as the rights in and over passageways as shown on a plan entitled, "Plan of Land in Canton, Mass.," April 3, 1948, William L. Crocker, C.E., 46 Cornhill, Boston, Massachusetts and recorded with Norfolk Boeds as Plan No. 250 of 1948 in Plan Bock 145.

The above described premises are the same premises intended to be conveyed as Parcols "h" and "B" in deed of Tobo Deutschmann Corporation to Goorgo H. Lawless, dated August 5, 1948, recorded with Norfolk Deeds in Book 2777, Page 267. See also deed of said Lawless to Leon J. Kowal, dated June 18, 1949 and recorded with said Deeds in Book 2837 Page 574, and deed of said Kowal to the grantee named herein, dated November 3, 1952 and recorded with said Deeds in Book 3130 Page 184.

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Deed recorded in Book 3446, Page 352:

A certain parcel of land with the buildings thereon situated on a right of way Easterly from Washington Street in Canton, Morfelk County, Commonwealth of Massachusetts; shown as Lot E on "Plan of Land in Carton, Massachusetts" by John F. Walsh, civil engineer, dated December 10, 1955, to be recorded herewith, and more particularly, bounded and described as follows:

Beginning at the Southeast corner of the granted premises at the Southwest corner of other land of the grantee and in the Mortherly line of land now or formerly of James W. and Pauline S. Dennis; thence running Westerly along land now or formerly of said Dennis; 152.36 feet, to other land of the granter; thence running Mortheasterly along land of granter, 115.43 feet; according to said Plan, to the land now or formerly of the Brooks Glue Co., and the center line of a common passage way; thence running Easterly along land now or formerly of Brooks Glue Co. and the center line of said passage way, 91.55 feet to other land of the granter; thence running Easterly, 35.2 feet along said granter's land to land of the grantee; thence running Easterly 25. feet along land of grantee; thence running Southwesterly, 34.60 feet; thence Easterly, 0.90 feet; thence Southwesterly, 37.10 feet; thence running Westerly, 2. feet and thence Southwesterly 58.15 feet to point of beginning, the last five courses being by other land of the grantee.

Together with the right in common with the grantor and others entitled thereto and consistent with their interests to use the passage ways shown on said Plan, to Washington Street.

The grantor reserves to itself and its grantees and others entitled therete the right and easement to use, inspect, maintain and have access to water, sower, power and other utility lines and mains, if any, as at present constituted or involving no greater use of space, passing times, he or ever the premises hereby granted to or from premises now or formerly ewood by the granter and for such purposes, to enter upon the premises hereby granted; and the granter hereby grants the right and easement, to the grantee to use, inspect and maintain such lines and mains, if any, as at present constituted or involving no greater use of space, in premises retained by the granter which service the grantee and for such purposes, the right and easement to enter upon premises retained by the granter subject to rights and easements granted to others by the granter.

The right of the granter and its past or future grantees to enter upon the premises herein granted to inspect and maintain sold water, sever, power and other utility lines and mains and the right of the grantee and its parties to enter for said purposes upon premises retained by the granter, are to be exercisable only in the event and to the extent of the failure of the persons upon whose premises the inspection and maintenance is necessary, to repair and maintain the same, the person so entering for such purpose to indemnify the person whose premises are so entered, from any cost, loss or damage resulting from such entry or such repair or maintenance.

Deed recorded in Book 3565, Page 12:

the land with the buildings thereon situated in Canton, Norfolk County, Hassachusetts, shown as Lots F, G and H on a Plan of Land in Canton, Hass., dated Hay 8,

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1957, by John P. Walsh, Registered Civil Engineer, to be recorded herewith, and bounded and described as follows:

Lot H

Northwesterly by the southeasterly line of Washington Street, forty and 42/100 (40.42) feet;

Northeasterly by Parcel C as shown on a Plan of Land in Canton, Eass., dated Oct. 1965, by M. A. Mahoney, C.E., recorded in Morfolk Deeds, Book 2787, page 366, one hundred twenty-nine and 63/100 (129.63) feet;

Southeasterly by lot B as shown on a Plan of Land in Canton, Mass., dated May 1, 1948, by John P. Walsh, recorded in Book 2754, page 266, eighty-three and 32/100 (83.32) feet; and

Southwesterly by land now or formerly of Walter S. Dennis, one hundred twenty and 69/100 (120.69) feet.

Lot F

Southwesterly by said lot B, one hundred twenty-six and Oh/100 (126.04) feet;

Northeasterly and Northerly by various courses, by Parcel D as shown on said plan dated Oct. 1948, by N. A. Mahoney, one hundred seventy-one and 43/100 (171.43) feet;

Southeasterly by land conveyed to Brooks Glue Company, Inc., by deed dated April 7, 1960, recorded in Book 2766, page 601, and shown on a Plan of Land in Canton, Mass., dated April 3, 1968, recorded as Plan No. 250 in Plan Book 145, twenty and

Southerly 48/100 (20.48) feet; by Parcel E on said plan dated Oct. 1948, fifty-five and 26/100 (55.26) feet;

Easterly by the same, forty-eight and 50/100 (48.50) feet;

Southeasterly by said land conveyed to Brocks Glue Company, Inc., about ten (10) feet;

Northeasterly by the same, eighty-seven and 58/100 (87.58) feet;

Southeasterly, in part by the center line of a wall, by Lot "E" as shown on a Plan of Land in Canton, Mass., dated Dec. 10, 1955, by John P. Walsh, C.E., recorded as Plan No. 101 in Plan Book 201, one hundred eleven and 43/100 (111.43) feet;

Southwesterly by said land now or formerly of Walter S.

Dennis, about one hundred five and 21/100
(105.21) feet;

Northwesterly by said Lot B shown on said plan dated Kay 1, 1948, thirty-four and 70/100 (34.70) feet;

Southwesterly by the same, five (5) feet;

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Northwesterly by the same, thirty-eight and 59,100 (38.59) feet; Northeasterly by the same, one and 60/100 (1.60) feet; and Northwesterly by the same, fifty and 32/100 (50.32) feet.

Lot G

Northwesterly by said land conveyed to Brooks Glue Company, Inc., forty-seven and 16/100 (47.16) feet;

Northeasterly by the same, nine and 92/100 (9.92) feet; Northwesterly by the same, twelve and 03/100 (12.03) feet; Southwesterly by the same, nine and 91/100 (9.91) feet; Morthwesterly by the same, twenty and 66/100 (20.66) feet; Southwesterly by the same, by two courses, fifty and 35/100 (50.35) feet;

Northwesterly by the same, ninety-five and 88/100 (95.88) feet;

Southwesterly by said Lot "E" on said plan dated Dec. 10, 1955, twenty-three and 46/100 (73.46) feet; Southeasterly by Lot "B" as shown on a Plan of Land in Canton, Mass., dated Dec. 10, 1952, by John P. Walsh, C.E., recorded in Book 3146, page 114, seventy-five (75) feet;

Northeasterly by Lot A on a Plan of Land in Canton, Mass., dated May 24, 1954, by John P. Walsh, C.E., recorded in Book 3325, page 51, eighteen and 73/100 (18.73) feet;

Southeasterly, Easterly and Northeasterly by the same one hundred thirteen and 55/100 (113.55) .fcet;

Southeasterly by the same, eight (8) fect; and Hortheasterly by land now or formerly of August Thiel, about fifty and 5/10 (50.5) feet.

Be all said measurements more or less, and be the premises however otherwise bounded or described.

The granted premises are conveyed together with and subject to the easements and rights of way granted and reserved in the following deeds, all so far as now in force and applicable:

Elijah A. Horse to Samuel Billings, dated July 20, 1883, Book 548, page 573;

Felicia V. Morse et al to J. L. Prescott Company, dated

July 31, 1911, Book 1187, page 353; Canton Reel Co. to August Thiel, dated May 28, 1920, Book 1456, page 403;

Tobe Deutschmann Corporation to Brooks Glue Company, Inc., dated April 7, 1948, Book 2746, page 431;

Same to Control Engineering Corp., dated May 14, 1946, Book 2754, page 266;

Same to George II. Lawless, recorded August 24, 1948, Book 2777, page 267;

Same to same, dated October 1, 1948, Book 2787, page 384; Same to Emerson & Cuming, Inc., dated January 8, 1953, Book 3146, page 114;

Same to Walter J. manson, dated December 6, 1954, Book 3325, page 51;
Same to Emerson & Cuming, Inc., dated January 28, 1956, Book 3446, page 353.

The granted premises are also subject to a lease to Boston Edison Company, dated October 25, 1941, Book 2366, page 194, to a grant to Boston Edison Company, dated January 9, 1947, Book 2659, page 141, and to taxes assessed as of January 1, 1957.

Deed recorded in Book 3847, Page 426:

the land in Canton, show as Lot "A" on a plan entitled "Plan of Land in Canton, Mass. Belonging to James W. & Pauline Dennis", dated September in 12, 1960, prepared by John P. Walsh, (of even record herewith) and bounded and described, as shown on said plan, as follows:

NORTHEASTERLY	by other land of the grantee, thirty-five and 12/100 (35.12) feet;
EASTERLY	by Lot "C", one hundred nine and 76/100 (109.76) feet;
NORTHEASTERLY	by said Lot "C", in two courses measuring eighty- five and 73/100 (85.73) feet and two hundred sixty-nine and 80/100 (269.80) feet, respectively;
NORTHWESTERLY	by said Lot "C" sixty-one and 61/100 (61.61) feet;
NORTHEASTERLY	by other land of the grantee, seventy-three and 50/100 (73.50) feet;
SOUTHEASTERLY	by land now or formerly of the Canton Housing Authority, one hundred eighteen and 53/100 (118.53) feet:
SOUTHWESTERLY	by land now or formerly of Estey and Endicott, in three courses measuring ninety-eight and 01/100 (98.01) feet, one hundred forty-two and 65/100 (142.65) feet and one hundred fifty and 85/100 (150.85) feet, respectively;
NORTHWESTERLY	by other land of the grantors, forty-nine and 77/100 (49.77) feet; and
SOUTHWESTERLY	by said land of the grantors, in two courses measuring forty-nine and 06/100 (49.06) feet and one hundred forty-three and 66/100 (143.66) feet, respectively.

All of said measurements and boundaries being as shown on said plan, and containing 33,109 square feet, according to said plan.

This conveyance is made subject to those easements granted to the Tobe Deutschman Corp., recorded in Books 2408, Page 551, 2562, Page 335 and 2562, Page 338, Norfolk Deeds, all insofar as and only to the extent

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that the same affect the granted premises, and only insofar as the same are now in force and applicable.

Being a part of (and intending hereby to convey a part of) the premises conveyed to us by Deed of James W. Dennis dated April 25, 1949, recorded at Book 2825, Page 521, said Deeds.

Deed recorded in Book 3917, Page 596:

two certain parcels of land in said Canton, with the improvements thereomas follows:

Parcel 1.
A certain parcel of land with the buildings thereon,
situated on the southeasterly side of Washington Street in Canton,
Massachusetts, and sometimes known and numbered as 863 mashington
Street, and shown as lot "B" on a "Plan of Land in Canton, belonging to Tobe Deutschmann Corp." by John P. Walsh, registered Civil
Engineer, dated May 1, 1948, containing 16,960 square feet, more
or less, recorded with Norfolk County Registry of Deeds, as Plan
384 of 1948, Book 2754, Page 266, and bounded and described as
follows:

Northwesterly by lot "A" on said plan eighty-seven and 8/100 (87.08) feet.

Northeasterly by other land now or formerly of said Tobe Deutschmann Corp., by three courses, one hundred and is sixty-two and 26/100 (162.26) feet to a spike in the pavement

Southeasterly by other land now or formerly of Tobe Deutschmann Corp., fifty and 32/100 (50.32) feet to a point on the outside face of a three-story brick building.

Southwesterly by other land now or formerly of Tobe Beutschmann Corp., one and 60/100 (1.60), feet.

Southeasterly by a building now or formerly of Tobe Beutschmann Corp., thirty-eight and 59/100 (38.59) feet,

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Northeasterly by a building now or formerly of Tobe Deutschmann Corp., five (5) feet,

Southeasterly by other land now or formerly of Tabe Deutschmann Corp., thirty-four and 70/100 (34.70) feet,

Southwesterly by land now or formerly of Walter 5. Dennis, forty-four and 90/100 (44.90) feet,

Northwesterly by land now or formerly of Walter S. Dennis, fifteen and 10/100' (15.10) feet, and Southwesterly by land now or formerly of walter S. Dennis, one hundred twenty and 89/100 (120.89) feet.

Alleas shown on said plan aforementioned and filed and recorded aloresato.

Being the same premises convered to the grantor by deed of Ideal Kealty Corp., dated August 24, 1953 and recorded with said deeds, Book 3195, Page 401.

Parcel 11.

A certain parcel of land situates in said anton and pring shown as lot "" on "Plan of Land in Canton, Hass." belonging to James W. and Fauline Dennis, John F. Halsh, U.S., dated Jan. 23, with Norfolk Deeds, Book 3212, Page 18, 1954 recorded, bounded and described as follows:

- Northerly by land now or formerly of the grantor one hundred twenty and 89/100 (120.89) feat,
- Southeasterly by other land now or formerly of the grantor, fifteen and 10/100 (15.10) feet,
- Northerly by other land now or formerly of the grantor, land now or formerly of Toba Deutschmann Corp. and land of the grantee three hundred thirty-six and 5/10 (336.5) feet,
- Southeasterly by land now of formerly of Dennis, sixty-one and 61/100 (61.61) feet,
- Southerly by land now or formerly of Dennis by two courses, two hundred sixty-nine and 80/100 (269.80) feet and eighty-five and 73/100 (85.73) feet, respectively, and

Northwesterly by land now or formerly of Dennis, one hundred nine and 76/100 (109.76) feet.

They

Said premises are hereby conveyed subject to two easements granted to Tobe Deutschmann Corp. as shown on said plan and recorded with Norfolk Deeds, Book 2408, Page 551 and Book 2562, Page 338, respectively, and a third easement as shown on said plan and a lease to Boston Edison Co. and recorded with said deeds, book 2659, page 141.

Being the same promises conveyed to granter by deed of James \overline{W} , and Pauline Dennis dated February 18, 1954 and recorded with said deeds, Book 3242, page 18.

Deed recorded in Book 3695, Page 543:

PARCEL I

Beginning at a stone post on the Westerly line of the location of the New York, New Haven and Hartford Railroad tracks (sometimes also identified as the Poston & Providence Railroad right of way) about twenty (20) feet Northerly from the wing wall of the railroad viaduet (see point marked "abutment" on Sheet 1 of Pian entitled "Pian of Land in Canton, Mass., formerly property of Repenset Meeten Mills, compiled from various deeds & plans by John P. Walsh, Civil Engineer, dated December 19, 1958", to be recorded herewith); thence turning and running in a

NORTHVESTERLY	direction by land now or formerly of Cole, one hundred two and 75/100 (102.75) feet, to a point; thence turning and running in a
SOUTHWESTERLY	direction, still by land of said Cole, fifty- five (55) feet to a stene menument on Neponset Street; thence turning and running in a
SOUTHEASTERLY	direction along Reponset Street, ninety-seven (97) feet to a stone bound at the end of a wall; thence running along Reponset Street in a similar direction in two (2) courses of eighty-two and 15/100 (82.15) feet and one hundred fifty-seven and 66/100 (157.56) feet to a point on a curve; thence turning and running along said curve, still in a generally Southeasterly direction, seventy-five and 70/100 (75.70) feet to a point; thence turning and running and running in a
NORTHEASTERLY	direction, two hundred sixty (260) feet, more or less, to a point on a curve; thence turning and running in a generally
NORTHWESTERLY	direction, one hundred thirty (10) feet to the noint of the abutment; thence Northwesterly twenty (20) feet to point of beginning.

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Being the same premises shown on said Plan as "Lot A", and all of said points and monuments being as shown on said Plan.

PARCEL II

Commencing at the Northerly boundary of the Canton River, as shown on said Plan, on the Westerly side of Neponset Street; thence running in a generally

SOUTHWESTERLY direction, four hundred thirty (430) feet, to a point on the Northerly bank of the Canton River at which said Northerly bank intersects a property line shown on said Plan as "Approx. Fuller Prop. Line"; thence turning and running in a

SOUTHEASTERLY direction, twenty (20) feet, to the thread of the stream; thence turning and running generally in a

southwesterly and then MCTTMMESTERLY direction of hundred twenty (600) feet to a point on the thread of the stream intersecting a line on said Plan shown as "Apprex. Line Estween Lot C & D"; thence turning and running in a

SOUTHEASTERLY direction along said line between Lots C and D², three hundred twenty (320) feet, to a point on the Southerly side of the Mill Race shown on said Plan; thence turning and running in an

EASTERLY direction, thirty-eight (38) feet, to a point on the South side of the Mill Race opposite a fence post as shown on said Plan; thence turning and running in a

SOUTHEASTERLY direction along the woven wire fence shown on said Plan, three hundred and five (305) feet, to a stone bound on the North side of Valpole Street; thence turning and running generally in an

EASTERLY and NONTHEASTERLY direction along the Northerly side of Valpole Street in three (3) courses of one hundred and five (105) feet, two hundred eleven and 69/100 (211.69) feet and three hundred forty-one and 20/100 (3/1.25) feet, respectively, to a point on a curve on the North side of Valpole Street; thence turning

and running in a generally direction along the Kertherly line of Walpole Street, one hundred seventy-three and 40/100 (173.44) feet, to a stone bound; thence two line and running in a

NORTHWESTERLY direction along the Westerly side of Repenset Street, two hundred twenty-three (223) feet to the point of beginning.

Being the same parcel shown on said Plan as "Lot C", and all of said points and monuments being as shown on said Plan.

PARCEL III

Beginning at a point on the Northwesterly side of said Rullroad line running generally in a Westerly direction along a curve,

one hundred seven and 02/100 (107.02) feet, to a stone bound on the South side of Walpole Street, as shown on said Plan; thence turning and running

SOUTHWESTERLY along said South side of Malpole Street in two

(2) curves of three hundred fifty-two and 77/100 (352.77) feet and sixty-six (66) feet, respectively, to a point on the South side of Walpole Street, which is the Northeasterly corner of land now or formerly of Bordenko;

thence turning and running

SOUTHEASTERLY along the Northeasterly boundary of said land

> of Bordenko, three hundred ninety (350) feet, more or less, to a point on the Northwesterly boundary of land shown on said Plan as land of the "N.Y. H.H. & H. RR."; thence turning

and running generally in a

NORTHEASTERLY direction, three hundred (300) feet along said

Northwesterly boundary of the Railroad land to a point; thence turning and running, but

still in a

NORTHEASTERLY direction, sixty (60) feet, still along land

of sald Rallroad, as shown on said Plan; thence

turning and running still in a

direction along land of said Railroad, as shown on said Plan, two hundred sixty-three (203) NORTHEASTERLY

feet to the point of beginning.

Deing the same premises shown as "Lot B" on said Plan, and all of said points and monuments being as shown on said Plan.

All of the foregoing references to said Plan are to Sicet 1 thereof.

FARCEL 1V

Beginning at the thread of the stream of said Canton River at the Northwesterly bound of Lot C as shown on said Plan; thence turning and running generally in a

MESTERLY and SOUTHMESTERLY direction along the thread of the

stream, sixteen hundred seventy (1670) feet, to a point fifteen (15) feet from the North side of a ditch shown on Sheet 2 of sald Plan; thence

turning and running

fifteen (15) feet, to a point near the most SOUTHWESTERLY Northeasterly point of the ditch shown on said

Sheet 2 of said Plan; thence turning and

running generally in a

SOUTHEASTERLY direction along a Northeasterly boundary of

land now or formerly known as the "Canton and Sharon Park Plot", four hundred twenty (420) feet, to a point; thence turning and running

generally in an

EASTERLY direction along the Northerly boundary of said

Canton and Sharon Park Plot, seven hundred (700) feet, to a point; thence turning and running

SOUTHEASTERLY along a Scuthwesterly boundary of said Park Plot,

one hundred (100) feet, to a point; thence

turning and running

KORTHEASTERLY

NORTHERLY

NORTHERLY

along a Northwesterly boundary of said Plot, two hundred fifty-eight and 0//100 (258.07) feet, to a point; thence turning and running in a direction, ninety-five and 68/100 (05.88) feet,

to the most Northwesterly point of Walpole Terrace shown on Sheet 2 of said Plan; thence

direction, mixty (60) feet, along Whipole

turning and running in a

NORTHEASTERLY

Terrace to a point on the North side of Walpole Terrace; thence turning and running in a direction, forty-five (45) feet, along the Westerly boundary of Let 7, as shown on Sheet 2 of said Plan to a point; thence turning and

running in an

EASTERLY

direction along the Northerly boundary of sald Lot 7, one hundred twenty-nine and 58/100 (129.58) feet, to a point; thence

SOUTHEASTERLY

turning and running in a direction along the Northeasterly boundary of said Lot 7, forty-nine and 65/100 (49.66) feet, to a point on a curve on the Northeasterly side of Walpole Terrace; thence

SOUTHEASTERLY

turning and running in a generally direction along said curve, eighty-two and 47/100 (82.47) feet, to a point on a woven wire fence which is a part of the boundary of Lot C hereinabove described, and which point is one hundred eighty-eight (188) feet from the Northerly side of Walpole Street

Bging the same premises shown on said Flan as "Lots D1 and D^{2n} , and all of said points and monuments being shown on Sheets 1 and 2 of said Plan, read together.

However otherwise said premises may be bounded or described, and be any or all of said measurements more or less, it being the Intention, however, of the Grantor to convey by this instrument all the land on which are constructed the Reponset Woolen Hills! buildings, so-called, and the adjoining promises, as are included within the bounds of Lots h, B, C, D^1 and D^2 on the Plan hereinbefore referred to, including but without limiting the rights Grantee may otherwise have with respect to the granted premises, the right to use the water flowing through the Granted premises by the East branch of the Neponset River, and a right to maintain a dam on the granted premises across said East branch of the Reponset River, the height of which dam may be at least as high as the bolt placed in a drill hole in the viaduct near the Westerly corner of the Northerly abutment of the most Northerly arch of the viaduct of the Poston & Providence Rellroad, the top of said dam being at least as high as said bolt, said right being referred to in the deed from Wright et al to the Grantor, recorded at Norfolk Deeds Book 1512, Page 243.

As a part of the granted premises, the Grantov also serveys to the Grantee with quitelaim covenants the ree in those portions of said Repenset and Walpole Streets on which the granted premises bound, except insofar as the granted premises do not bound on both sides of said streets, as to which such portions this conveyance includes only the fee to the

middle of the way, and the Grantor's right, title and interest in the balance thereof; but the foregoing grant with respect to said ways is subject to any takings made by municipal or other governmental authorities thereof for the purpose of laying out and maintzining public ways.

Excepting and excluding from the foregoing that parcel (conveyed out by Emerson & Cuming, Inc.) by deed recorded in Book 4409, Page 518, and bounded and described as follows:

the land in Canton, Norfolk County, Massachusetts, bounded and described as follows:

Beginning at a point on the Northwesterly side of land of the N.Y. N.H. & H. RR. thence running generally in a Westerly direction along a curve, one hundred seven and 02/100 (107.02) feet, more or less, to a stone bound on the South side of Walpole Street, as shown on the Plan hereinafter referred to; thence turning and running

SOUTHWESTERLY along said South side of Walpole Street two (2) distances of three hundred fifty-two and 77/100 (352.77) feet, more or less, and sixty-six (66) feet, more or less, respectively, to a point on the South side of Walpole Street, which is the Northeasterly corner of land now or formerly of Bordenko; thence turning and running SOUTHEASTERLY along the Northeasterly boundary of said land of Bordenko, three hundred ninety (390) feet, more or less, to a point on the Northwesterly boundary of land shown on said Plan as land of the "N.Y. N.H. & H. RR."; thence turning and running generally in a NORTHEASTERLY

NORTHEASTERLY

NORTHEASTERLY

direction, three hundred (300) feet, more or less, along said Northwesterly boundary of the Railroad land to a point; thence turning and running, but still in a

direction sixty (60) feet, more or less, still along land of said Railroad, as shown on the Plan hereinafter referred to; thence turning and running still in a direction along land of said Railroad, as shown on said Plan, two hundred sixty-

three (263) feet, more or less, to the point of beginning.

The aforementioned premises being the same premises as shown as "Let B" on Sheet 1 of a Plan entitled "Plan Of Land In Canton, Mass., Fermerly Property of Reponset Woolen Mills Compiled From Various Deeds & Plans by John P. Walsh-Registered Civil Engineer, December 19, 1958, Scale 1 in. = 40 ft.", recorded at Norfolk Deeds as Plan No. 6 and 7 of 1959 in Plan Book 206.

Title to the Canton property is subject to the following exceptions:

Thomas

VI. MANUFACTURING

A. EMERSON & CUMING MANUFACTURING PROCESSES

Emerson & Cuming (E&C) presently has available for sale a miniumum of 300 standard products. This number dramatically increases when specially formulated products are taken into account. However, these products can be grouped by method of manufacture, resulting in the following nine manufacturing process descriptions.

DIELECTRIC MATERIALS

Resin Based Products and Catalysts

ECCOSORB High-Loss Dielectric Absorbers

ECCOSHIELD

Molding Powders

Plastic Rod & Sheet Stock

MICROWAVE PRODUCTS

ECCOSORB Free Space Absorbers

Lenses and Reflectors

FLOTATION PRODUCTS

Riser Pipe Modules & General Oceanographic

1. Dielectric Materials

a) Resin Based Products and Catalysts

Those products classified as resin-based materials include: casting resins (STYCAST), surface coatings (ECCOCOAT), adhesives and sealants (ECCOBOND), impregnating resins (ECCOSEAL), ceramic dielectrics (ECCOCERAM), silicone resins (ECCOSIL), and plastic and ceramic foams (ECCOFOAM).

The manufacture of an individual resin-based product is essentially a formulated mixing operation. Pre-weighed amounts of from four to twelve different raw materials are loaded into a mixing vessel, ranging in size from a gallon container to a two-hundred-fifty gallon kettle; the most frequent size being a fifty-five gallon drum. The materials are mixed utilizing a drill press and adjusted to final product specifications, primarily viscosity, based on quality control testing. E&C is presently using approximately two-hundred-fifty different raw materials in their resin-based material formulations. However, the primary base ingredients for these products consist of liquid epoxy resins, silicone resins, and powdered fillers; such as, aluminum, silica, iron, zinc, and titanium.

ranging in size from one-ounce tubes to gallon cans; the most common size being quart cans. Within this product grouping there are two types of materials: one component products; and two component products, which require the addition of a catalyst or the mixing of two components prior to use in the field.

The catalysts are used as curing agents with various E&C epoxy formulations reacting with those products and forming thermosetting solids or foams.

The manufacture of catalysts consists of mixing two to four different raw materials utilizing a drill press. The mixing vessel can range in size from a quart container to a fifty-five gallon drum, with a five-gallon pail being used most frequently. Following the mixing process, the catalyst is packaged into containers ranging in size from two-ounce jars to quart cans, with the most common size being four-ounce jars. In addition to manufacturing catalyst products, E&C also purchases standard epoxy catalysts and repackages those materials under their own label.

b) ECCOSORB

The ECCOSORB name is applied to both "free space" microwave absorbers and "high-loss dielectric" microwave absorbers. Described here is the manufacturing procedure for "high-loss dielectrics" which are produced and sold as casting resins, flexible sheets, and machinable bar and rod stock.

Rod and bar stock are manufactured by mixing epoxy resins, fillers, and iron particles in a gallon container using a drill press. The material is deaerated, poured into a mold, and oven cured. Following curing, the mold is disassembled and the material is machined to final customer specifications. Sheet stock is manufactured by mixing iron or graphite particles with resins and fillers in a small container utilizing a drill press. These products cure at room temperature and, after being deaerated, are formed into sheets by passing the material between an adjustable roller and a flat surface. Casting resins are manufactured utilizing the identical process as resin-based products.

c) ECCOSHIELD

The ECCOSHIELD product line is composed of conductive plastic materials available in the form of sheets, gaskets, liquid adhesives, lacquers, and pressure sensitive tapes. The manufacturing of all ECCOCHIELD products involves pre-mixing formulated amounts of silver particles, resins, fillers, and, in some cases, catalysts. The pre-mix solution is formed into sheets by passing the material between an adjustable roller and a flat surface, followed by air or oven drying. Gaskets are punched from the sheets using a die specially constructed to customer specifications. Pressure sensitive tape is produced by passing the pre-mixed material through an extruder.

d) ECCOSPHERES

E&C manufactures three basic types of ECCOSPHERES: hollow glass and ceramic spheres, referred to as microballoons; and plastic spheres, referred to as macroballoons.

The hollow glass microballoons are manufactured from either a purchased feedstock manufactured to E&C specifications or from feedstock which E&C manufactures themselves. The feedstock is manufactured by producing a slurry using silicate, boric acid, and a blowing agent (UREA), which is then metered into a spray dryer; the dried material is collected and packaged utilizing cyclones. E&C is presently increasing their in-house spray dryer capacity which will eliminate the need to purchase manufactured feedstock.

The feedstock is later added to a blender/feeder which dispenses it into gas furnaces where the particle passes across an open gas flame to form the microballoons which are subsequently collected by the use

of a cyclone. Certain types of microballoon products are packaged directly from the cyclone and sold. Other types of microballoons are treated in order to upgrade their performance characteristics.

The treating of glass microballoons is accomplished through successive washings and steamings of the balloons in one of seven 700-gallon mixing vessels. During this process, depending on the desired type of treated balloon, chemicals are added periodically during the washing process to increase the strength of themicroballoon. The repeated washings also eliminate those talloons which are not complete spheres, since they sink to the bottom of the tank. Following the washing cycles, the microballoons are centrifuged, dried, and packaged for sale or for internal use in the manufacture of resinbased materials, or Flotation Products.

Ceramic microballons are manufactured from fly ash purchased from England. The particular type of fly ash used, a by-product of coal burning, is available from only one location in England due to the type of coke used at that power facility. The fly ush is in the form of a hollow sphere when purchased. A batch size of approximately 1100 pounds is loaded into one of two 350°F gas-fired tumbling drying ovens for a drying period of five hours and is then packaged into shipping containers.

Macroballoons are manufactured by expanding purchased polystyrene beads using steam. The beads are then placed in tumblers where they receive up to fourteen coats of an epoxy resin and glass fiber slurry in order to create a specific bead density and crush strength. Following quality control testing for density and crush strength, the beads are screened to eliminate agglomerates and packaged for shipping, or stored for later use in the manufacture of Flotation Products.

e) Molding Powders

E&C molding powders (ECCOMOLD) are manufactured utilizing silica, resins, and catalysts. The first step involves the treating of purchased silica with a material which activates the silica surface providing increased adhesion to resins. Purchased resin is granulated into a fine powder and, together with the treated silica, is added to a blender along with other materials, depending upon the product to be manufactured. This blended material is fed into a twin screw helical extruder; the operation of which is time and temperature controlled. Extruded material is discharged onto cooling rolls and subsequently granulated into a fine powder. Following a screening operation and the removal of metal particles utilizing magnets, the material is packaged into bags for sale.

f) Plastic Rod and Sheet Stock

Plastic rod and sheet stock products (ECCOSTOCK) are manufactured from purchased fillers and resins which are mixed in gallon and five-gallon containers utilizing small drill presses. The mixture is deaerated and poured into a mold of any shape. The mold is then oven cured with cycle times of one to three days at 100°F to 380°F. Following curing the material is removed from the mold and machined to final customer specifications.

2. Microwave Products

a) ECCOSORB Free Space Absorbers

There are four different manufacturing processes used in the manufacture of microwave absorbers as described below.

VHP's and WG's

These solid, pyramidal (VHP) and wedge-shaped (WG) absorbers are manufactured from purchased polyether foam buns to heights of from 4" to 150". The buns are band-sawed into blocks, into which pyramids are cut using a hot wire cutter. Each block is compressed, submerged, and then expanded in a tank containing a solution mainly consisting of carbon black, water, and latex; thereby distributing the solution throughout the piece. They are removed from the tank, compressed again to remove excess solution, and placed in a drying oven for two days at 220°F. If a fire retardant absorber is desired, the blocks are dipped for a second time in a fire retardant solution, air-dried for twenty hours, and oven dried for three days. Following drying the absorbers are trimmed, painted with a waterbase paint, checked for weight, and boxed for shipping.

HPY's

These hollow, pyramidal absorbers are manufactured in heights of 12" to 80" from purchased sheets of polyester foam. The sheets are passed through a roller dip tank containing a carbon black, latex and water solution and are air or oven dried. If a fire retardant absorbent is being produced, the sheets are then dipped and dried for a second time. The sheets are cut to a particular length (depending upon product being manufactured), sprayed on one side with an adhesive, and two sheets are hand laminated. The laminated sheets, now called blankets, are joined along the edges with either one or two more blankets, depending upon the height of absorber being produced. For those absorbers larger than 40" in height, the blanket is laminated with styrofoam for increased strength, prior to grooving. These blankets

machine, or are cut on their diagonal and placed on a special grooving machine. Grooves are cut into the blankets to permit later folding, and the blankets are cut completely through along every fourth groove, forming a triangle. The bottom edges are trimmed square. This triangular shaped blanket is then hand formed into a pyramid and from one to sixteen pyramids (depending on size) are attached to a pre-cut polyester foam base. The absorber is spray painted and, if weatherproofing is desired, will be sprayed with an adhesive then covered with a special cloth.

CV's

These solid, convoluted absorbers are manufactured from purchased polyester buns to heights up to 6". The polyester buns are cut into slabs on a horizontal slicer and passed through a convoluter which imparts the tapered shape of the absorber to the foam. The convoluted slabs are then passed through a roller dip tank containing a carbon black, water and latex solution. Following this impregnation step the slabs are oven dried and trimmed to final size. If weather-proofing is desired, a carbon impregnated absorber will be mated to a convoluted piece of raw foam and covered with special cloth. Both the weatherproofed and non-weatherproofed absorbers are spray painted with a waterbase paint and packaged for shipping.

AN's and LS's

These multi-layered absorber sheets (AN's) and single-layer absorber sheets (LS's) are manufactured from either purchased polyester foam sheets, or from pieces trimmed from purchased polyester buns. As in HPY manufacturing, these sheets, or pieces, are passed through a

roller dip tank containing a carbon black solution and are subsequently dried. The sheets, or pieces, are cut into squares and checked for performance. Based on the thickness and the performance, the sheets are inventoried for later use as AN absorbers.

AN absorbers are composed of multi-layered stacks of sheets which have been glued and pressed together, tested for reflectivity, weatherproofed if desired, and painted for identification.

b) Lenses/Reflectors

Spherical lenses and reflectors are manufactured to any nominal diameter size in the range of three to forty-eight inches.

Purchased polystyrene beads are expanded through the use of heaters and are screened and separated, according to size. Density is determined and the beads are placed into the female portion of a hollow semi-spherical mold, in a formulated density mixture. The mold is closed, live steam is injected for a period of twenty minutes, thus creating a permanent bond amongst the beads. The shells, now approximately one-half inch thick, are removed, dried overnight, and lightly sanded. Shells of different diameters are hand assembled in layers building up to the final lens or reflector diameter. Following anechoic chamber testing, the lenses are packaged and the reflectors are fitted with a reflecting cap. The reflector is then encapsulated in a steam cured epoxy coating which provides physical protection. Following additional anechoic chamber testing, the reflector is then packaged.

3. Plotation Products

ECCOFLOAT - Riser Pipe Modules

Since each riser pipe is of a different configuration, prior to commencing the manufacture of buoyancy modules, it is necessary to design and construct two-piece molds to be used to form the desired buoyancy module. E&C has historically manufactured the frames for these molds and contracted the interior construction to a professional mold maker. The average mold costs between \$3,000 to \$5,000, and the number purchased would depend upon the particular module order size.

Mold preparation includes the stapling together of pre-cut glass cloth and mat, which is then cemented to the interior surface of both the male and female section of the mold. The two sections are clamped together, hoisted into a vertical position on a vibrating table, and filled with macroballoons while the mold is being vibrated.

Next, the mold is placed into a vacuum tank and filled, under vacuum, with a solution of resin, microballoons, diluent, and a curing agent which is added to the resin solution immediately prior to the vacuuming operation.

Once filled, the molds are removed from the tanks and are either air-cured, or oven-cured, at 200°F. The mold is opened, the riser module is removed, trimmed, sand-blasted, patched, and painted. Buoyancy and core sample checks are periodically performed. The modules are stenciled, weighed and crated for shipping.

Utilizing similar manufacturing procedures, E&C manufactures
Flotation Products in a wide variety of shapes and performance
ranges, with each application requiring a different material
formulation.

VI-B PROPERTY AND FACILITIES

E&C has seven manufacturing facilities: two in Canton, Massachusetts, which also house their central administrative and research facilities; and one each in Gardena, California; Northbrook, Illinois; Oevel, Belgium; Scunthorpe, England; and Hokkaido, Japan. In addition, they also own a two-story facility in London, England, which is utilized as European headquarters, and an office area is leased in Yokahama, Japan, housing Japanese headquarters. Also, several small sales office facilities are being rented throughout the world at the following locations: Silver Spring, Maryland; Philadelphia, Pennsylvania; Richardson, Texas; Paris, France; Cologne, Germany; and Milan, Italy.

The following pages describe each of the manufacturing facilities, including a summary table of pertinent data and a plot plan on each one. The first facility discussed is Plant I in Canton, Massachusetts.

(See Table and Plot Plan on the Following Pages)

VI-E EMERSON & CUMING - PURCHASING/RAW MATERIALS

Emerson & Cuming (E&C) utilizes a minimum of 380 different raw materials in the manufacture of their 300 standard products, with 90% being used in the manufacture of dielectric materials. As a general practice, E&C purchases most individual raw materials from a single source, primarily because of the low volumes used, number of different materials required, and technical time necessary to qualify additional sources. However, the majority of these raw materials are available from other suppliers who could be qualified in the event that E&C's primary source was unable to supply. Further, Dewey and Almy already has excellent relationships with most of E&C's suppliers.

The following discussion includes charts detailing the major raw materials used by E&C by product group, accounting for a minimum of 65% of the total E&C raw material purchase costs. The charts include only those materials whose procurement significantly affect a total product group and whose costs/volume warrants inclusion. In addition, E&C management maintains that the effects of an inability to procure those other raw materials could be minimized through reformulating the products, whereas an inability to procure materials on these charts would have a more significant effect on E&C's business.

The table on the following page shows key raw materials data for E&C's Dielectric Materials business and is followed by a discussion of the data.

(See table on following page)

EMERSON & CUMING RAW MATERIAL DATA

•	DIELECTRIC MATER	IALS	(1)		(2)	(3)	(4) 1975-1977
Line	<u>Material</u>	Primary Suppliers	1977 Quantity Purchase		1977 Price/Unit	1977 Total <u>(</u> \$000)	Price Incr. Avg. Annual Inc./(Dec.
	Epoxy Resins	Shell -					
(01)		v. s.	365,000		\$.72	\$262.8	9.5%
(02)		Europe	160,000		.92	147.2	3.4
(03)	,	Japan	15,000	Tps.	1.05	15.8	(0.2)
		Ciba-Geigy -			- •		•
(04)		U. S.	67,000	lbs.	.75	50.3	9.1
(05)		Japan	29,000	lbs.	1.10	31.9	1.6
•		_	•				
		Dom -					
(06)		Europe	21,000	lbs.	1.12	23.5	0.6
(07)	Silver Silflake	Handy-Harmon	65,000	Tr.02	. 5.27	34 2.6	(1.1)
(07)	135	Others	4,200			26.4	(4.5)
(00)		• • • • • • • • • • • • • • • • • • • •	.,	,			(400)
(09)	Tabula Alumina	Alcoa	275,000	lbs.	.30	82.5	5.4
			40.000	••			
 (10)	Carbonyl Iron Powder	GAF	40,000	ibs.	1.57	62.8	5.4
(11)	Silicone Resins	Stauffer	35,000	lbs.	3.85	134.8	2.7
(12)		Gen. Elec.	3,900		3.85	15.0	2.7
			·				
(13)	PMDA	DuPont	7,000	lbs.	7.50	52.5	- .
(14)	Polyglycol Diamine	Union Carbide	21,000	lbs.	3.02	63.4	1.9
(15)	TEPA	Union Carbide	53,000	1ha	1.16	61.5	10.5
(16)	144 61	Bayer	19,000		1.23	23.4	(11.9)
(10)		,	,		~•=-	~3 •-7	(/
(17)	Pleogein 4050	Amer. Petrochem.	19,000	lbs.	1.15	21.9	7.2
	•						
(18)	BGE	Ciba-Geigy	22,000	lbs.	1.19	26.2	9.9

Checked By: JBN
Date: 11/4/77

Since most of the dielectric materials are specially formulated, there are many raw materials which are important in the formulation of a particular product, but whose cost and quantity used is quite small and, therefore, do not appear on the chart. However, we have not attempted to research the availability and possibility of substituting for such materials since inability to procure such an item would not dramatically affect a total product group.

Epoxy Resins

As will also be discussed in the Flotation Products section, the types of epoxy resins used by E&C are readily available from many sources, with at least two sources of supply expanding their liquid epoxy capacities.

Silver Silflake 135

This flaked 99% silver material is used throughout the ECCOSHIELD and ECCOBOND product lines. E&C U. S. is presently purchasing 100% of their requirements from Handy and Harmon Company in Canton, Massachusetts. The European and Japanese divisions purchase their silver requirements from local suppliers.

In the event that Handy and Harmon were no longer able to supply this product, other flaked silver manufacturers in the U. S., such as Alcoa, would be available. This situation is unlikely based on discussions with Handy and Harmon personnel who presently offer this material for delivery within twenty-four hours of order placement.

Tabula Alumina

This low iron content, 325 mesh, aluminum powder is used as a filler in the manufacture of STYCAST and ECCOBOND products to enhance their thermal conductivity. E&C presently purchases this material from Alcoa, who is the only world supplier of this type of aluminum. Other higher iron content, harder mesh aluminum powders are available from Kaiser and Alcoa and could be utilized in these dielectric material formulations in the event that this particular type was not available.

Carbonyl Iron Powder

This 99.9% pure iron powder is formulated into ECCOSHIELD and ECCOSORB products providing those items with specific microwave properties. E&C presently purchases this material from GAF, the existing sole source of supply. However, identical material is available from specialty formulators such as Belmont Metals, Inc. in New York.

Silicone Resins

E&C presently uses three different types of silicone resins in their dielectric material formulations, purchasing 90% from Stauffer and 10% from General Electric. These low viscosity, unfilled resins become the formulation building blocks for the ECCOSIL product line. Substitute materials are available from Dow Corning in addition to General Electric and Stauffer. In fact, Stauffer is the smallest manufacturer of the three available suppliers. E&C is not a large user of silicone resins and no future supply problems are anticipated.

PMDA

PMDA (pyromelliticdianhydride) is available in the United States only from DuPont Chemical and is a component used in the manufacture of two E&C catalysts. This material can be obtained in Europe from Merck and Veba Chemie AG; however, the quantities used by E&C are such that alternate sources should not be necessary in the foreseeable future.

Polyglycol Diamine

This material, used in the manufacture of one E&C catalyst, is purchased from Union Carbide, which is the only known source of supply for this material. However, in the event this material was unavailable from Union Carbide, a replacement could be formulated using readily available amines.

TEPA

TEPA (tetraethylenepentamine) is an epoxy resin catalyst sold as a catalyst by E&C. This material is purchased in the U. S. from Union Carbide and in Europe from Bayer Chemical. In addition, two English sources of supply are also available for this material.

Pleogein 4050

This low water content polyester resin is used as a coreactant in the manufacture of ECCOFOAM, a urethane foam. E&C purchases this material from Mor Rez Division of American Petrochemical Co.

BGE

BGE (butylglycidol ether) is an epoxy resin diluent used in the manufacture of STYCAST products. E&C presently purchases this material from Ciba-Geigy, however, other similar epoxy resin diluents are available from Shell Chemical and Reichhold Chemical.

The following table shows key raw materials data for E&C's Microwave Products business and is followed by a discussion of the data.

EMERSON & CUMING RAW MATERIAL DATA

	MICROWAVE PRODUC	<u>CTS</u>	(1)		(2)	(3)	(4)
Line	Primary Material Suppliers		1977 Quantity Purchased		1977 Price/Unit	1977 Total (\$000)	1975-19 Price Ir Avg. Annu Inc./(De
(01)	Pliobond 2014	Goodyear	12,000	gal.	\$ 6.55	\$ 78 .6	13.67
(02) (03) (04)	Neoprene Latex	DuPont- U.S. Europe Japan	75,000 35,000 30,000	lbs.	.57 .52 .73	42.8 18.2 21.9	17.9
(05)	Oncor 23-A	N.L. Industries	9,500	lbs.	1.60	15.2	(1.7)
(06)	Vulcan XC-72 Pellets	Cabot Corp.	20,000	lbs.	.40	8.0	4.0
(07) (08) (09) (10)	Polyurethane Foam	General Felt United Foam Alleluia Cushion PRB - Europe	2,450		135.00 11.00 .90 1.17	45.9 27.0 70.2 31.7	6.0 N.A. N.A. 4.9
(11) (12)		Bridgestone KK Japan		pcs.	168.50 15.69	9.1 25.1	. -

⁽a) While neoprene latex has increased 17.9% per year during the three year period 1975-1977, the price has been stable during the past two years.

Microwave Products

Pliobond 2014

Pliobond is an adhesive, manufactured by Goodyear Tire & Rubber Co., used throughout the microwave absorber manufacturing process for such things as; bonding polyester foam sheets together in the HPY manufacturing process, bonding finished absorbers to their bases, and bonding weatherproofing cloth to absorbers. Goodyear is the only available supplier for this material; however, similar types of adhesives are available from Goodyear and other manufacturers, such as Goodrich.

Neoprene Latex 400

This latex is one material used in the carbon black dipping solution for impregnating microwave absorbers. DuPont is the sole source of supply for this material however, E&C is a relatively small consumer and DuPont does not anticipate any future supply problem.

Oncor 23-A

Oncor is a fire retardant used in the dipping solution for impregnating fire retardant microwave absorbers. This material is a combination of antimony oxide and inert silica which imparts a flame resistance to the foam. N. L. Industries is the only known source for this material; however, in the event that Oncor 23-A was unavailable, E&C could accomplish the same purpose using antimony trioxide, a readily available substitute.

Vulcan XC-72 Pellets

These conductive carbon black pellets are one of the components used in the microwave absorber dipping solution and are presently being purchased from Cabot Corporation. Other similar types of carbon black are readily available from suppliers such as Cities Service.

Polyurethane Foam

E&C presently purchases polyester and polyether foam in the form of rolls or buns at a specific foam density. The rolls are converted into hollow microwave absorbers (HPY's) and the buns into solid microwave absorbers (VHP's). E&C presently has several foam sources available at the three microwave manufacturing locations. These sources include General Felt Co., United Foam, Alleluia Cushion, and PRB. There are several other sources who supply these types of foam and the utilization of a new source would only require the establishment of mutually agreeable quality control procedures to insure a continuing supply of foam at a proper density.

The following table shows key raw materials data for E&C's Flotation Products business and is followed by a discussion of the data.

EMERSON & CUMING RAW MATERIAL DATA

			•				
٠	FLOTATION PRODU	<u>CTS</u>	(1)		(2)	(3)	(4)
Line No.	<u>Material</u>	Primary Suppliers	1977 Quantity Purchased	<u>P</u> 1	1977 rice/Unit	1977 Total (\$000)	1975-1977 Price Inc. Avg. Annual Inc./(Dec
(01) (02)	Epoxy Resins	Shell - U. S. Europe Ciba-Geigy -	390,000 331,000	lbs.	\$.72 .92	\$ 280.8 304.5	9.5% 3.4
(03)		U.S.	60,000	lbs.	•75	45.0	9.1
√(04) (05)	Versamid 140	General Mills Union Camp	180,000 10,000		1.00 1.00	180.0 10.0	- - .
(06)	Epoxide 8	Proctor & Gamble	70,000	lbs.	•94	65.8	5.2
/ (07)	Milled Fibers	Ferro Div. Reichhold	188,000	lbs.	.53	99.6	4.0
√ (08)	Microballoons B-23/500	3M	182,000	lbs.	.95	172.9	5.7
/ (09)	KFP-524	Arco Polymers	38,000	lbs.	.78	29.6	2.0
_v (10)	Enkamat	American Enka	115,000	sq ft	23	26.5	(12.4)
_v (11)	Glass Cloth	Owens Corning	24,000	lbs.	.75	18.0	8.3

Flotation Products

Epoxy Resins

By far, the most important large volume raw materials used by E&C are the epoxy resins. E&C is presently purchasing four similar types of epoxy resin from Shell Chemical (90%) and from Ciba-Geigy (10%). These resins are used in virtually all the dielectric and flotation products formulations.

In addition to Shell and Ciba-Geigy, similar types of epoxy resins are available from Dow Chemical, Celanese, General Mills, and Reichhold Chemical. At the present time, Reichhold is actively pursuing a portion of E&C's epoxy resin re-

130 million pounds per year. In addition, Shell Chemical presently has plans to double their liquid epoxy capacity from 52 million pounds per year to 100 million pounds per year by the second quarter of 1978. It is also rumored that Ciba-Geigy is planning an expansion providing an additional 26 million pounds per year. No future supply problems are anticipated and if the two expansions do take place, there is a possibility of an overcapacity situation.

Versamid 140

This polymerized amine is used in flotation riser module formulations as an epoxy curing agent. While E&C presently procures 95% of their requirements from General Mills, substitute materials are available from several customers such as Union Camp, Ciba-Geigy, Reichhold, and Humko Chemical. In addition, Reichhold is actively pursuing a portion of E&C's polyamid business.

Epoxide 8

This epoxy diluent is used in the formulation of flotation products. Procter & Gamble (P&G) is the only known source of supply for the Epoxide 8 material; however, other epoxy diluents could be used in the event that P&G was unable to supply this material.

Milled Fibers

These 1/32" long fiberglass fibers are used in the coating of expanded polystyrene beads which are then formulated into flotation products. E&C purchases these fibers from the Ferro Division of Reichhold Chemical. Reichhold has indicated that the Ferro manufacturing capacity for these fibers will be expanded in the future and no supply problems are anticipated. In addition,

similar acceptable fibers could be obtained from Henry and Frick, a distributor for Owens Corning.

Microballoons B-23/500

These microballoons, purchased exclusively from 3M, are used in the formulation of riser pipe modules intended to operate at a depth of 2,000 feet or less.

E&C presently manufactures microballoons used in riser module formulations for applications at depths greater than 2,000 feet. 3M is presently the only source of supply for this particular type of microballoon. However, if necessary, E&C could use their own microballoon in place of the 3M microballoons in the riser module formulation. However, E&C has found that it is economically advantageous to purchase this type of microballoon for the particular module application, as opposed to manufacturing a substitute.

KFP-524

This gasoline resistant polystyrene bead is purchased exclusively from Arco Chemicals. These beads are expanded and coated with milled fibers to be used in flotation product formulations. Arco is the only manufacturer of a polystyrene bead which will expand to approximately 3/8" diameter when subjected to steam. Discussions with Arco reveal that E&C is a small consumer of these beads and continued supply should not be a problem. Foster Grant and BASF manufacture polystyrene beads, however, these beads are a smaller size and reformulation of E&C's flotation product would be required to utilize these beads.

Enkama t

This spongy nylon material is used to line the riser module molds prior to their filling with a resin, microballoon, and polystyrene bead formulation. After

filling and curing, the enkamat becomes a protective integral exterior layer of the riser module providing a physical separation between the seawater and the microballoon components contained within a riser module. The American Enka Company is the sole source of supply for this material which is manufactured in Europe. In the event this material would be unavailable, E&C management feels that substitutes are available.

Glass Cloth

This fiberglass cloth material is also used to line the riser module molds prior to their filling with a resin, microballoon, and polystyrene bead formulation.

After filling and curing the fiberglass cloth also becomes a protective exterior layer of the riser module. This material is presently purchased from Henry and Frick, a distributor for Owens Corning Co. and acceptable substitutes can be purchased from Owens Illinois.

The table on the following page shows the key raw materials used in the manufacture of E&C's Microballoons and is followed by a discussion.

(See table on following page)

EME	RSON	&	CUP	ING
RAW	MATE	RI	AL	DATA

	MICROBALLOONS		(1)	(2)	(3)	(4)
Line	<u>Material</u>	Primary Suppliers	1977 Quantity Purchased	1977 <u>Price/Unit</u>	1977 Total (\$000)	1975-1977 Price Incr Avg. Annual Inc./(Dec.
(01)	Sodium Silicate	Diamond Shamrock	500,000 lbs.	\$.03	\$ 15.0	13.0%
(02)	Boric Acid	New England Chem.	48,000 lbs.	.24	11.5	22.5
<u>(</u> 03)	Urea	New England Chem.	5,300 lbs.	.14	.7	24 . 7
(04)	Cenospheres	Hargraves	450,000 lbs.	.015	6.8	-

Microballoon Products

As discussed in the Manufacturing Process section, E&C manufactures their micro-balloon feedstock, using a spray dryer, in Canton, as well as utilizing Custom Processing, Inc. in New Jersey to manufacture about 50% of their feedstock. E&C has recently increased their spray drying capacity and anticipates manufacturing 100% of their microballoon feedstock at their Canton, Mass., facility. In the event that the E&C spray drying manufacturing operation is taken out of operation, the total feedstock requirements can be manufactured by Custom Processing, insuring a continuing feedstock source of supply.

Sodium Silicate

This raw material used in the manufacture of microballoon feedstock is presently being purchased almost exclusively (95%) from Diamond Shamrock. Several other sources of supply are available for this material, such as Allied Chemical, DuPont, Philadelphia Quartz, the Davison Division of W. R. Grace & Co.

Available industry capacity is such that no future supply problems are anticipated.

Boric Acid

This component of microballoon feedstock is a borate derivative purchased almost exclusively from New England Chemical. Other sources of supply are available, such as Kerr McGee, Stauffer, and U. S. Borax. The present supply for borates, and hence boric acid, is quite tight; however, based on E&C quantities used, no future supply problems are anticipated.

Urea

This third component of microballoon feedstock is also being purchased almost exclusively from New England Chemical. Many other sources of supply are available with the E&C quantities used being miniscule in comparison to the urea availability.

Cenospheres

As discussed in the Microballoon Manufacturing Process section, this material is converted into ceramic microballoons by E&C through a drying operation. The material is a microballoon purchased from Hargraves in London, England. This material is fly ash, a by-product of coal burning, and is available from only one location in England due to the type of coke used at that power facility.

Discussion with Hargraves by E&C management has revealed that there exists an abundance of this fly-ash at this location ensuring a continuing supply for at least 10 years.

Listings of effluent and atmospheric discharge generated in the manufacture of the product line.

June 1973	-	Waste service information
Feb. 1975	-	Air contaminants report.
March 1975	~	Process waste discharge into sanitary sewer.
April 1975	-	Fuel burning Equipment Registration
November 1976	-	Fuel burning Equipment Registration
December 1976		Process Manufacturing Equipment
March 1978	-	Hydrocarbon Emissions Registration
May 1978	_	Liquid Organic Material Storage
May 1978	· -	Process Manufacturing Equipment
May 1978	-	Process Fuel Burning Equipment
		Registration.

Mall



The Commonwealth of Massachusetts Metropolitan District Commission 20 Somerset Street, Boston 02108

SEWERAGE DIVISION

Re: Questionnaire

Dear Sir:

The enclosed questionnaire has been developed to supply the Sewerage Division of the Metropolitan District Commission with needed information, so that we may serve you more efficiently and program your future needs.

The requested information will be used in the classification of various process waste discharges and to aid in forecasting future waste service demands, trends, and loadings. Your cooperation in responding to this questionnaire is urgently solicited to identify the most critical program (s) which require modification or enlargement.

The questionnaire should be completed as soon as possible and returned to the indicated address. Matters pertaining to specific manufacturing processes will be considered privileged information.

Your participation and interest in this industrial survey is appreciated.

Sincerely,

APF:mc

Director of Sewerage Division and Chief Sewerage Engineer

THE COMMONWEALTH OF MASSACHUSETTS METROPOLITAN DISTRICT COMMISSION SEWERAGE DIVISION

	t from stated address, please correct when	n answering
A) Name of	Company, EMERSON & CUMINE	M/C.
B) Business	Address, 59 UALFOLE ST CAN No. Street Town of	ITON MA UZOZI
	No. Street Town or	r City Zip Code
Telephone N	umber, 821-3300 3. Years	at present location 20
Type of in	ustry, CHEMICALS	
		<u> </u>
B) Major o	Industrial Classification Index Number,_coducts or services: <u>CHEMICAL RE</u>	SINS ! INDREANIC
		, , , , , , , , , , , , , , , , , , , ,
C) List ty	oe and quantity of chemicals used annually	
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C) List ty	e and quantity of chemicals used annually consumption, 17,000 of supply, 7000 of CANTON	cu. ft/day or gal/d
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Daily water A) Source	consumption, 17,000 of supply, 7000 OF CANTON ne of waste discharged into Public Sewer, narge:- Sub-surface or ground, Surface waters,	cu. ft/day or gal/d
Daily water A) Source	c consumption, 17,000 of supply, 7000 or CANTON ne of waste discharged into Public Sewer, narge:- Sub-surface or ground,	cu. ft/day or gal/d
Daily water A) Source of Total volum Other disci	consumption, 17,000 of supply, 7000 OF CANTON ne of waste discharged into Public Sewer, narge:- Sub-surface or ground, Surface waters,	cu. ft/day or gal/d

) Is pretreatmen	t practiced? _	Yes No
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b) Screenin		
c) Sediment		<u> </u>
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implementation	it planned?	YesNo, if "Yes", indicate
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ischarge of Wast f "Yes" indicate	number of copi	esNo
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- · ·		W. MORGAN Date
		MANAGER
11016:		JUI/11010-LX
		·
•		
Please return to	:	METROPOLITAN DISTRICT COMMISSION SEWERAGE DIVISION
		20 SOMERSET STREET
	·	BOSTON, MASSACHUSETTS 02108
•		Att: Noel Baratta
		Assistant Sanitary Engineer
		(Telephone: 727÷8989)

APPLICATION COORDINATES DATE RECEIVED NUMBER 1607 59 Nalpole St. Cunta PLEASE MAINTAIN COPY $\mathcal{L}(\mathbf{S}) = \{i_1, \dots, i_k\} = 1$ CONTROL OF THE PROPERTY OF THE and the state of the control of the state of Service and the service of the service of with the trade of order delivering the property े पुरुष राजा के हैं है है जिस्सा हता है कहाता नहीं है। इस्तुल्सा वर्ण कराई कराई है 4775 . होसोस्तरी अस्तिहरू करावा करावास क्षेत्रणाई र के उद्योक्ताच्या करी स्वाक्ति द्वारा के के ता ति त्राच्या की नव करते अवस्थित कहा कर कहा का के तह कर न रतम् । । । । । । व्यक्ति च कार्या १ वर्षे ेल अवन प्राण हो छ। छहा है कहूं १ उद्धांने १० व्यक्ति है है ्रोतिहरूकाम जात्रकर छङ्ग । हुन्। State of the state Administration out (3) neitellij to som promit neid som det stellenden et tempte na gemen et gemen de na gemen ett mann hand bank som ett som ett som ett en gale mil hand ett en de som ett en de som ett en de som ett en de som The said to the section against the company of the section of the tam 1988 of bulleneight word and and the court of the second was the felt 1996 THE PROPERTY OF THE PROPERTY OF STANDARD PROPERTY AND THE PROPERTY OF THE PROP भवदार एक विकास सम्बद्धा कर समाप्त समाप्तादक तथावण । विकासका **एक उत्तर स**्वार्थ के विद्वार राज के बाद र प्रता । काकि **का रजे**र कार्रिक्त स्थाप हर है। aditional contradictive topic the arts more balled on your groot topolitical t marrie Meirier Coffice. - रानेन विवास के दूरिका हुए हो तार के आंग्रिक प्रवास करा के प्रश्नात के कार्य के समाध्य कर राजा THERE IS A COUNTY OF THE PROPERTY OF THE PARTY OF THE PROPERTY what you can, You had be enneated if thereon it for young is dure assign but the company of the per ads of the soll of there are topically because the MA CAMPILLARY REPORTED IN 12 Color of the Course of Star कर्षे कर्त । १९ कार प्रतिश्व । १ के Charles for the late of them. Formation of protect Central Level . 可供收付款 数型污渍剂 ্যাভারত ভক্তর মূর্ Subtraction as a 2 to 1 to 1 to 300 1 vs OFFICIAL USE ONLY Date Inspected Inspector

APPLICATION FOR THE REGISTRATION OF PROCESSING OR MANUFACTURING EQUIPMENT, SOLVENT USEAGE, AND INCINERATORS OPERATED DURING THE CALENDAR YEAR 1974

The Bureau of Air Quality Control, Division of Environmental Health, Department of Public Health, requests you to complete and return this application within 30 days under Regulation 12 of the Regulations for the Control of Air Pollution. You will receive written acknowledgement upon satisfactory completion of the application.

BEFORE FILLING OUT THE APPLICATION, PLEASE READ THE FOLLOWING INSTRUCTIONS:

			regardiess of		
any equipment	which n	reeds to	be registered,	must comple	te page one.

- Indicate any changes in the name and/or address on page one.

- The information submitted should pertain to the calendar year 575. 1974

- An application is required for each location of:

- (a) process and/or manufacturing operations where air contaminants are vented or discharged into the ambient air;
- (b) solvent useage;
- (c) incinerator(s).

Springfield, Tel. 413-785-5327

- The owner is ultimately responsible for registering his air pollution source. Each page must be signed by the owner or by a responsible company official at the location. If an agent has been designated to fill out this form, the owner or official must check and sign this form. If you are a tenant or property manager, your cooperation is asked for by forwarding this application to the owner.
- Additional forms may be copied from the original or obtained from the nearest District Office.
- The form is designed for a wide variety of applicants and many of the questions may not apply or may require engineering expertise. Answer what you can. You will be contacted if further information is necessary.
- Returned applications should be directed to the District Office checked below:

1	50.1011.	•
d i	Metropolitan Boston APCD 600 Washington St., Rm. 320 Boston, Tel. 617-727-2658	Southeastern Mass. APCD Lakeville State Hospital Lakeville, Tel. 617-947-1060
	Merrimack Valley APCD Tewkesbury State Hospital Tewkesbury, Tel. 617-727-7908	Central Mass. APCD 75 Grove Street Worcester, Mass., Tel.617-791-3672
	Berkshire & Pioneer Valley APCD 1414 State Street	•

LOCATION OF SOURCE TO BE REGISTERED:
Facility Name <u>FMFRION & CUMINIA; INI.</u>
Address SA WALPOLE ST.
City or Town CANTON, MASS. zip Code 62021
A. L. Did you previously receive and return a registration form? Yes_ No \underline{V}
2. If yes, were there any significant changes or additions to the registered equipment or changes in production rate during the calendar year 197 Yes No
B. Approximate number of employees 95
C. Operating hours of source: hrs/day \mathcal{S} ; days/wk \mathcal{S} ; wks/yr \mathcal{S}
D. 1. What products are produced or services rendered? [10LDED PLASTICS
2. Are processing or manufacturing operations involved? Yes $\underline{\times}$ No If yes, complete page two.
3. Are solvent containing materials used as an integral part of the process or manufacturing? Yes No $\underline{\times}$. If yes, complete page three.
E. Do you have/or operate an on-premise incinerator? YesNo If yes complete page four.
F. If pages two, three, and/or four are no applicable, so indicate in the appropriate box on the page and sign the page.
G. Person to be contacted for further information, if necessary:
Name /// // // Title PLANT MAR. (please print)
Address 369 1/99/1/270N ST Area Code 17 Tel. 121-3300
City or Town GENTON Zip Code 02021

If true, check	box	and sign	below.			aminants are v	vented or	- disci	1		ng Schedu'i	
Major Steps Involved In Process		Type Equip, Used	Type	MATERIALS	Avg/ Yr.	FINISHED I		Avg/ Yr.	Hrs per day	Days per week	Wks per	Months in Operation (e.g.,Sept-May
FIBERIUSS COPTINIE	7,4	ENDER	FIBERIA	-5/	200,000				8	.5~	52	
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How is gas/a vented to st (fan,blower,	ack	Ht above ground		ta for Proc Exit Velo- city (ft/sec)		Quantity of Gaseous Dis- charge (cfm)	5. Air Type	E	ing Equi Percent fficience ated Act	y	6. Proce Type Con- taminant Collected	Removed
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INSTRUCTIONS

	MANUFACTURING	

Major Step: State process (e.g., casting, heat treating, wood finishing, cement manufacturing, etc.).

Type Equipment Used: Give name of equipment (e.g., rotary dryer, grey iron cupola furnace, storage silo, heat treat oven, conveying/handling equipment, paint booth, plating tank, extruder, etc.).

Raw Material: State what material is used in measurable unit such as tons, feet, or number of items produced. Indicate maximum amount of material used per hour and total quantity per year. Give estimates if exact number not known. Examples of raw materials: iron scrap, sand, aluminum, cotton, hardwood, etc. Finished material: State the final product in measurable units (e.g., wood chairs, machinery, drill bits, clocks, etc.)

- 2. OPERATING SCHEDULE: Give hours, days, weeks of normal operation. Estimate if exact numbers not known. Under months of operation, name months that process is in operation.
- 4. STACK/VENT DATA FOR PROCESS:

 This information should correspond with Section 1.

 -Stack Height: Estimate if measure—
 -inside Diam: ment not known

3. SELF EXPLANATORY

-Exit Velocity(FPS) Provide
-Exit Temperature(OF) if
-Quantity of Gaseous Available
Discharge

5. AIR CLEANING EQUIPMENT:

Type: State type of control equipment used to control emissions from process. If no equipment, please indicate "none", (e.g., baghouse, electrostatic precipitator, cyclone, etc.).

<u>% Efficiency</u>: Rated efficiency is % efficiency as stated by the manufacturer of control equipment. Actual efficiency is % efficiency determined by stack testing. Provide if known.

6. PROCESS EMISSIONS:

Type Contaminant Collected: Indicate type of contaminant controlled (e.g., iron oxide dust, mineral dust, formaldehyde, sulfur dioxide, etc.).

Amount Removed (Ton/yr): State total tons/yr. of contaminant prevented from being exhausted to air by control equipment. This number can be obtained by exact measurement or material balance.

7. This will identify which stack serves which process. It is suggested that you number each stack/vent and assign corresponding numbers to the equipment being registered.

COMMENTS:	
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	and the

PAGE THREE

Materials Containing Solvents Used in Process and/or Hanufacturing
INSTRUCTIONS: This section is to be completed if materials containing solvents
are used as an integral part of the processing or manufacturing in quantities of
greater than or equal to 40 lbs. per day. This means, for instance, that materials containing solvents used to clean machinery should not be mentioned and
those used in such operations as surface coating (paint, varnish, lacquer, enamel,
primer, glaze, resin, sealer shellac, etc.), laundries (degreasing agents, dry
cleaning agents), and miscellaneous (adhesives, insecticides, printing inks, putty) should be mentioned.

•	Surface Co	Amount Max Hour	(ga Annu	il)	Contro	p et I Equip	Height (Ft)		scharge (cfm)
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٠.						· · ·			: •
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2.	Solvent C	leaners Max Hour	Annua 1	Recov System		Discharge Method	Height (Ft)	Disc (c	
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•	Type	Amoun		Per Soi	cent ids	Contro Equipmen	l Hei	Venght	Discharg (cfm)
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FR	TIFICATION	i certify to the be subjects false and	that i	have by know	examine ledge, visions	d the above it is true of the Ger	e inform and com	ation a	and that (Signati

INCINERATORS

•	Manufacturer's Name	Make	Model #
	Type: single chamber multi	pathologica	l Other
,	Auxilliary Fuel, if any: gas	oil numbe	er of burners
	Flyash Control Devices, if any: type		
	Loading: type(s) waste max		,
	Operating schedule (please circle):		
-	hours of day 1 2 3 4 5 6 7 8 9 10 1	1 12 1 2 3 4 5	6 7 8 9 10 11 12
	days of week Mon Tues Wed Thurs		· · · · · · · · · · · · · · · · · · ·
	If incinerator has smoke stack separate		ck
	Stack(s)	1	2
	Height (ft). Inside diameter at top (ft) Exit Velocity (ft/sec)		
••	Exit temperature (°F)		
	b. Show location in Section H.	ووالمرابع والمناف المتحالف والمتحالف	
•	Has the incinerator(s) been approved	by the Bureau? Yes	s No
	Date of approval		
	Location of Stack(s) and/or Vents		
	a city or town map. In order to assist and minor streets indicating the appropriate to a series of the series of t	st us, please sketo	ch out several major
_	vents in respect to them.	SATIMATED TOTAL TOTAL	The Sepond diayor.
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R	TIFICATION: I certify that I have exam		
	the best of my knowledge,	it is true and com	plete. (Signature
	subjects signer to provisi false and misleading state	ons of the General	Statutes regarding

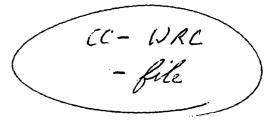


The Commonwealth of Massachusetts Metropolitan District Commission

20 Somerset Street, Boston 02108

SEWERAGE DIVISION

March 27, 1975



Victor Mergan, Plant Engineer Emerson & Cuming 869 Washington Street Canton, Massachusetts 02021

Re: Process waste discharges into the sanitary sewer.

Dear Mr. Morgan:

This confirms the results of the March 21, 1975 inspection of your company's premises by sanitary engineers from this office.

It is apparent that there is a substantial quantity of rinse water used to clean the chemical mixing tanks, containing mixtures of sulfuric acid and sodium borasilicate which is intermittently discharged into the sanitary sewer system. The backwash water used to rinse particulate matter (powered glass) from six (6) air filter beds is intermittently discharged, as well.

As stated at the time of inspection the plant process discharge is intermittently milky white in color and contains large quantities of suspended matter.

It is our understanding, that neutralization of the acid bearing waste stream is occasionally practiced prior to sewer discharge.

The discharge of the aforementioned process wastes with an unknown pH, containing unknown concentration of suspended solids could be in violation of the Metropolitan District Commission's Rules and Regulations. You are referred to Sections 4.h.l & 2, and 4.i of the enclosed copy of Rules and Regulations.

The Division is requiring at this time that your company contact an approved testing laboratory to conduct analysis on the process waste discharge.

The analytical data, to include: pH readings, total suspended solids and dissolved solids concentrations, turbidity and any other pertinent information should be submitted to this office prior to June 1, 1975, so that a fair and equitable evaluation of your process waste can be made.

If this office can be of assistance, please do not hesitate to notify us.

Sincerely,

A. P. Fisichelli

Assistant Director of Sewerage Engineering

NDB:dlm

enc. Rules and Regulations

ce: Thomas C. McMahon, Dir. of W.P.C.

Harold J. Publicover, Super., of Public Works, Canton

. 1. APPLICATION NO.

2. STACK NO.

	4	BOSTON,			& Parking .		USINESS ADDRES	S (NO. AND	STREET.	CITY, ZIP CODE)	PHONE
IIIM & W. S. T.	EMEASO	N F CH	MINE	INC	Marine Co.		SHINGTO		- 4	TON 020	21 - 428- 2200
PPLICANT						10.1 (4) (4) (4) (5) (5) (5) (5) (5) (6) (6) (6) (6) (6) (6) (6) (6) (6) (6	Service Cons		A \$5.00		
NSTALLATION		HARIMAN HARIAN HARI	Alinthialinthialinthia	illillillillillillillillillillillillill	ikiialliiliiliiliiliiliiliiliiliiliiliilii			T. Co			
QUIPMENT IG REGISTERED	TYPE OF EQUIPMEN	NT (e.g. Boiler, Space	Heater)		AME OF EQUIPMENT	MODEL NUMBER	NUMBEI UNITS O	OF IDENTICA N THIS FORM		POLLUTION CONTROL E (es, File Form AP-4) YES X NO	QUIPMENT USED?
IAJOR	MFG.	OFFICE [RETAIL OR WHLSE, STORE	SCHO OR C	HURCH HOTE	HOSPITAL OR LAB	WARE-	C RESIDE	NCE C	OTHER (Specify)	
TYPES OF FUEL USED	g FUEL .	GRADES	SULFUR CONTENT	ASH CONTENT	ANNUAL USAGE (Tons, Gals., or ft. ³)	MAXIMUM FIR PER UN	HT 150	SEASON	IAL USE	F	UEL SUPPLIER
edula .	4r.A.	(x)			(Tons, Gais., or II.)	(Lbs., Gals., ft. ³ /hr.)	(BTU/hr.)	Month Yr. It	o Month Y	r. Name	City or Town
	COAL ,	Bituminous Anthracite	* *	*						 	
		Kerosene	%		20.15		184 T N 184		-		
	oir 🔀	2	0.30%		36 000	14 GAL HA		-	- 7.	WHITE FL	EL BOSTON
		.4	. %		GAL				-		
		5	. %		3.74			 - 			
					Africa Paper				-		
	NAT. GAS		. %	. %				 -	-		
	OTHER				海黄龙			,	1		
FUEL USAGE BREAKDOWN	% OF FUEL USED FO	OR HEATING	50		EL USED FOR COOLING	or the state of the state of	% OF FUEL USED I	OR POWER	W.		USED FOR PROCESS
BURNER SEE	ARE OIL HEATERS U		***	rature before		URNER MANUFACTURER	New WAR	DATE OF	BURNER IN	STALLATION B	URNER MODEL NO.
TYPE OF COAL	HAND C	NO' NO' UNDERFEED	TRAVELIN		70 F	DER STOKER W	ITH GAS	CYCLONE	PUL	/ERIZED	
BURNER	☐ FIRED □	STOKER	GRATE	`` ;¦∐ Ğ	RATE STOKE	DER STOKER W	и Ц	FURNACE :	LJ COA	L	
TYPE OF OIL	PRESSURE OR GUN	Company C	ROTARY CUP	2.4個機口	T STEAM	AIR ATOMIZE	R 1944 - 1954	☐ TANGE	NTIALLY		THER pacify)
BURNER . 源		TROL	the same of the same	TYPE	OF DRAFT	4. 1. 4 - 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	TYPE OF ALL		CONTROL		☐ HAND CONTROLLED
BURNER	OVERFIRE AIR CON				A 200	IDUCED NATUR	AL X ON-OFF	LOV		HIGH-LOW FIRE	FULL AUTOMATIC
, , , , , , , , , , , , , , , , , , , 	☐ YES , 🔀		24.				VER OF D	ATE OF	DATE		
COMBUSTION	BREACHING GAS		DATE EQUIPME	NT WAS PUT IN	1. A.	PO	YPE OF D	ATE OF TEST	RATE (Pov	OF EMISSIONS nds Per Hour)	GROUP CONDUCTING TEST
COMBUSTION	BREACHING GAS TEMPERATURE EXHAUST GAS FLOT		MONTH	NT WAS PUT IN	1. A.		LLUTANT	ATE OF TEST	RATE (Pov	or EMISSIONS ands Per Hour)	GROUP CONDUCTING TEST
COMBUSTION EQUIPMENT INFORMATION	BREACHING GAS TEMPERATURE EXHAUST GAS FLOW		MONTH MAXIMU	M TARANTINA	AR IG HOURS		YPE OF LUTANT	ATE OF TEST	RATE (Pov	OF EMISSIONS nds Per Hour)	GROUP CONDUCTING TEST
COMBUSTION CQUIPMENT INFORMATION	BREACHING GAS TEMPERATURE EXHAUST GAS FLOT NORMAL STACK GAS VELOCI	*F W RATE (ACFM): ITY IN PEET PER SEC	MAXIMU OND EQUIP HOL	MENT OPERATIN	AR IG HOURS	18. STACK TEST	LLUTANT	TEST	RATE (Pov	OF EMISSIONS nds Per Hour)	GROUP CONDUCTING TEST
COMBUSTION QUIPMENT INFORMATION	BREACHING GAS TEMPERATURE EXHAUST GAS FLOT NORMAL STACK GAS VELOCI FACILITY OPERATIN HOURS/DAY	W RATE (ACFM); ITY IN FEET PER SECONG HOURS	MAXIMU OND EQUIP/ HOI	M YEEKS/YE	IG HOURS	15. STACK TEST RESULTS	LUTANT	TEST	(Pov	nds Per Hour)	
COMBUSTION QUIPMENT INFORMATION	BREACHING GAS TEMPERATURE EXHAUST GAS FLOT NORMAL STACK GAS VELOCI	W RATE (ACPM); ITY IN FEET PER SECONG HOURS AMELIC DAYS/	MONTH MAXIMU OND EQUIP HOLIWEEK SI ROUND STACK	MA PUT IN YE MA PUT IN YE MENT OPERATIN URS PER YEAR WEEKS/YE ZE OF STACK EX	GO HOURS SOCO EAR STANGULAR STACK	18. STACK TEST RESULTS	LUTANT	TEST EQUIPPED W	(Pov	nds Per Hour)	AT STACK EXIT
COMBUSTION EQUIPMENT INFORMATION	BREACHING GAS TEMPERATURE EXHAUST GAS FLOV NORMAL STACK GAS VELOCI HOURS/DAY STACK EXIT DIRECTI HORIZ. SMOKE INDICATOR	W RATE (ACPM): ITY IN FEET PER SECONG HOURS DAYS/ ION VERT. INSTACK MAKE	MONTH MAXIMU OND EQUIP HOI WEEK	M YEEKS/YI	IG HOURS COOO CTANGULAR STACK In. By A M. In.	15. STACK TEST RESULTS STACK HEIGHT (FEET)	ILUTANT IS STACK	EQUIPPED W	(Pov	AT? TEMPERATURE	AT STACK EXIT
COMBUSTION EQUIPMENT INFORMATION STACK INFORMATION	PREACHING GAS TEMPERATURE EXHAUST GAS FLOO NORMAL STACK GAS VELOCI FACILITY OPERATIO HOURS/DAY TACK EXIT DIRECT HORIZ. SMOKE INDICATOR YES	W RATE (ACFM): ITY IN FEET PER SECUNG HOURS DAYS/ ION VERT. Inel IN STACK MAKE	MONTH MAXIMU OND EQUIP HOI WEEK SI ROUND STACK de Diameter	M YEEKS/YI	IG HOURS COOO CTANGULAR STACK In. By A M. In.	15. STACK TEST RESULTS STACK HEIGHT (FEET) STACK LINING METAL	ILUTANT IS STACK I Y	EQUIPPED W	ITH RAIN H	AT? TEMPERATURE	AT STACK EXIT
COMBUSTION IQUIPMENT INFORMATION STACK	BREACHING GAS TEMPERATURE EXHAUST GAS FLOV NORMAL STACK GAS VELOCI HOURS/DAY STACK EXIT DIRECTI HORIZ. SMOKE INDICATOR	W RATE (ACFM): ITY IN FEET PER SECURITY IN STACK MAKE	MONTH MAXIMU OND EQUIP HOI WEEK SI ROUND STACK de Diameter	M YEEKS/YI	IG HOURS COOO CTANGULAR STACK In. By A M. In.	15. STACK TEST RESULTS STACK HEIGHT (FEET)	ILUTANT IS STACK I Y	EQUIPPED W	ITH RAIN H	AT? TEMPERATURE	AT STACK EXIT

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WE CHAOF ENVIRONMENTAL HEALTH, BUREAU OF AIR QUALITY CONTROL, 600 WASHINGTON STREET 111 **ROOM 320** BOSTON, MASSACHUSETTS 02111 (617) 727-2658 BUSINESS ADDRESS (NO. AND STREET, CITY, ZIP CODE) LEGAL NAME PHONE . FIRM WASHINGTON ST. CANTON 529-3300 02021 DIVISION . APPLICANT . INSTALLATION TYPE OF EQUIPMENT (e.g. Boiler, Space Heater) . EQUIPMENT BRAND NAME OF EQUIPMENT NUMBER OF IDENTICAL UNITS ON THIS FORM AIR POLLUTION CONTROL EQUIPMENT USED? (If Yes, File Form AP-4) MODEL NUMBER EING REGISTERED T YES . MAJOR RETAIL OR SCHOOL RESIDENCE OR APTS. HOTEL HOSPITAL WARE. OTHER WAFG. **ACTIVITY OF FIRM** WHISE, STORE OR CHURCH MOTEL OR LAB HOUSE (Specify) MAXIMUM FIRING RATE a. TYPES OF SULFUR FUEL SUPPLIER ASH ANNUAL USAGE SEASONAL USE FUEL GRADES PER UNIT FUEL USED CONTENT CONTENT (Tons, Gals., or ft,3) (Lbs., Gols., ft.3/hr.) Month Yr. to Month Yr. City or Town (x) (BTU/hr.) Name Bituminous % COAL Anthracite % Kerosene ·[7 OIL 33000 GAL RI GALIHR. BOSTOR 0.30 4 5 NAT. GAS OTHER 5. FUEL USAGE % OF FUEL USED FOR HEATING % OF FUEL USED FOR COOLING % OF FUEL USED FOR POWER % OF FUEL USED FOR PROCESS BREAKDOWN 30 0% ARE OIL HEATERS USED? OIL TEMPERATURE BEFORE INJECTION BURNER MANUFACTURER DATE OF BURNER INSTALLATION BURNER MODEL NO. O. BUYNER MNO TYES EQUIPMENT NALTHAM PULVERIZED 1. TYPE OF COAL TRAVELING HAND STOKER UNDERFEED CHAIN SPREADER STOKER WITH GAS CYCLONE BURNER FIRED GRATE GRATE STOKER REINJECTION FURNACE COAL PRESSURE 12. TYPE OF OIL ROTARY AIR OTHER STEAM TANGENTIALLY 5U2NER OR GUN CUP ATOMIZER ATOMIZER (Specify) FIRED OVERFIRE AIR CONTROL TYPE OF AIR FUEL RATIO CONTROL SYSTEM TYPE OF DRAFT HAND CONTROLLED 13. COMBUSTION YES TV NO FORCED NATURAL INDUCED B ON-OFF FULL AUTOMATIC CI LOW FIRE ☐ HIGH-LOW FIRE BREACHING GAS DATE EQUIPMENT WAS PUT IN SERVICE RATE OF EMISSIONS TYPE OF DATE OF GROUP CONDUCTING TEST POLLUTANT (Pounds Per Hour) 14. EQUIPMENT TEMPERATURE MONTH INFORMATION EXHAUST GAS FLOW RATE (ACFIA): NORMAL MUMIXAM 15. STACK TEST STACK GAS VELOCITY IN FEET PER SECOND EQUIPMENT OPERATING HOURS RESULTS HOURS PER YEAR 5000 FACILITY OPERATING HOURS J WEEKS/YEAR 52 DAYS/WEEK STACK EXIT DIRECTION SIZE OF STACK EXIT STACK HEIGHT (FEET) IS STACK EQUIPPED WITH RAIN HAT? TEMPERATURE AT STACK EXIT ROUND STACK RECTANGULAR STACK HORIZ. VERT. 60 PNO ☐ YES 16. STACK Inside Diameter_ INFORMATION SMOKE INDICATOR IN STACK I MAKE AND MODEL NO. OF SMOKE INDICATOR STACK LINING OTHER (Specify) HED YES NO REFRACTORY METAL NAME OF NEAREST 'ACK DIRECTION FROM INTERSECTION DISTANCE TO STACK (Circle cae) INTERSECTING STREET TO STACK 200 FT. N NE E SE & SIDW NW 'TION SIGNED TITLE 7/ DATE I certify that I have examined the above information and that to the best of my "W knowledge it is true and complete. (Signature subjects signer to provisions of the General Statutes regarding false and misleading statements),

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J. J. GREND CHUITINGNE ACCIDENTALLON

A. PROCESS/MANUFACTURING EQUIPMENT (see instructions, page 2 and 3)

APPLICATION NUMBER

•		Type		I	LOCATIO	N	PAW 1	1ATEP.IA			FINISKED	MATERIALS
Major Ste	ps Involv ceas	red Equi	pment		Bldg F		-	Type .	Max/. Hour	Total/ Year	Type	Max/ To: Hour/ Yes
		IELES ROBRY	OVEN(2)	2		ASCMENT						REDLAS HERES PEROVEN SOU,
			-			•						
——————————————————————————————————————			,									
ra. Day	e Wite.	ionths in	Stack	Stack direct	t don'	T.no:L anet	da di-	Heigh above	Temp.	Quantity Gascous	Exit Velo-	Doos Stack have rain
iay waa	k yr.	Operation	No.	()10r1:	z-vort)	top	(ft)	groun (ft.)	d (°F)	Discharge (acfm)	city (ft/sec)	cap?
1/E/1.	5.50	12	. }	 	, ,	,	; 	, ,,			;	•
		٠.										· ·
!							-					
27 4. 27	OCESS EMI	ISSIONS			,		PART .	5. EMI	SSION CONT	ROL SYSTEM	, IF APPLICA	JILE
/EUT Grack Number	Type	of Contami Emitted	nant (s)		Amou Umit Ton/	t ad		туре	Manufa	cturer	Percent Efficiency	Date of Installation
3.	CERAN	ic Du	ST		· · · · · · · · · · · · · · · · · · ·	:	BAGE	ILTER	DRAPER	BROS.		. 1976.
			 	-	,						·, ·	
•	1	,			1		Parti da en en en				e best of my	

A. PROCESS/MANUFACTURING EQUIPMENT (see instructions, page 2 and 3)

APPLICATION NUMBER

•	Type		LOCATI		RAW	MATERIALS			FINISHED	MATERIALS	
Major Steps Involved In Process	Equipment Used	Plant	Blde		-	Type	Max/ Hour	Total/ Year	.Type	Max/	Total
MANUFACTURE FEED STOCE	CHEMICAL SPRAY DEYER	/	5	/	SODI	UM SILICAT	E		FEED STO		
DRYING MYGROBALLOOUS	DRYING OVEN	1/	/	BASEMENT	} .	BALLOONS	1	,	MICROZALLO		100
MANUFACTURE MICROBALLOONS NT 2. OPERATING SCHED	BALLOONING FURLACECIO) DULE PART 3.	STACK	VENT	19.2 DATA	FEE	D STOCK		<u> </u>	MICROBALLO	0115	350,0
Mrs. Days Wks. Mon		Stack direct (horiz	exit ion	Insi anet	de di- er at . (ft)	Height above ground (ft.)	Gas Temp. (°F).	Quantity Gascous Discharge (acfm)	Exit Velo- city (ft/sec)	Does Sta have rai cap?	
. PART 4. ITEM 1	, <u></u>		<u> </u>		T. 1 4				:		
8 3 50 1	Z VENT	HORIX	CONTA	6	x6"	10'	450F	INKNOW N	NIKISOWIS	NA	
. PART 4. ITEM					PART	5. EMISS	ION CONT	ROL SYSTEM,	IF APPLICA	BLE	
	Contaminant (s)		Emi	unt tted /yr.		Type	Manufa	cturer	Percent Efficiency	Date of Install	
. X/A PARTICULAT	ES	LESS TH	IAN O.	ILBS/IR	BAGHO	USE a	ORIT DI	Vision J CO.	99.9 %		197
INENT FLUE GA	15	uta Calianda	*****								
NA PARTICULA		LESS THE	1.001	LBS/HR	BAGHO	USE (3) N	TORIT DI	A) Co.	99.9%		197
ENTIFICATION: I certific is true and complete.		examine	dothe) کشورسر	الماليان ا	ation	on this p	age and	that to, the		knowledg	e,

B. PROCESS FUEL BURNING EQUIPMENT (see instructions, page 5)

Type		LOCATI		Size of Unit	BURNER	' FUEL DATA	,	
Equipment		PQUIE		(Indicate Etu/	Type (a)	Type	Amt/yr.	Marcimum
. Used	Plant	Bldg	Floor	hour or hap)	(rot, cup, gun, etc)	Fuel	(barrels, gals, tons, cu.ft.)	Hourly . Fuel Kate:
SPUR DRYER	. /	5	/	1,250,000 BTU/HE	ATMOSTHERIC TORCH	NATURAL GAS	476,000 CU/FT.	119000/1
TOPING WENT	.j.		BASEMENT	800,000 BTU/AR	ATHOSPHERIC TORCH	MATULAL GAS	1,300,000 cu/Fr	723 cul
BALLOONING.		-2	/	310,000 BTU/HR(EA)	ATMOSPHERIC TORCH	MATURAL GAS	7.085,700 cu/Fi	1770 cu/
BALLOWING	/	5	2	310,000 BTU/HR (EA)	ATMOSPHERIC TOPCH	NATURAL GAS	1,417, 110cy-5	1180 cs/

PART 2.	oren	TING SC	HEDULE:	PART 3.	STACK/VENT D	ATA:					
lira. por day	Days per week	per	Months in Operation	Stack No:	Stack 3xit Direction (horiz-vert)	Inside Di- ameter at top (ft)	Height above grount (ft)	Exit pas Temp. (OF)	Quantity gascous discharge (acfm)	Exit velo- city (ft/ sec)	Poes stack have rain cap?
1. 8.	1	5.0.	12	N.A.	- SEE SEC	TION A. PA	RT5E	MISSION	CONTROL S	45 TEV	0
2. 8	3	50	12	VENT.	HORIZONTAL	,	10 1.0	450°F	•	}	
3.16	5-	50	. / 긴	N.A.	SEF SECTION	WA. PARTS	- (EMISSI	ON CONT	206 SUST	EM)	
<u>s.</u> 8	3	50	12	4.A	SEE SECTION	N. L. PARTS	(EMISSI	on cons	ROLSHITE	(M)	

PART 4. PROVIDE A ROOF PLAN SHOWING LOCATION OF STACK(a) AND VINT(a).

CENTIFICATION: I certify that I have examined the information on this page and that to the best of my knowledge, it is true and complete.

SIGNED E Jan Bourlotte

TITLE Pauf 1970 - DATE 18 17 76

n. PROCESS FUEL BURNING EQUIPMENT (see instructions, page 5)

PART 1. EQUIT		LOCAT	ION	Size of Unit	BURNER	FUEL DATA		
Equipment Used	Plant	Bldg Bldg	Floor	(Indicate Etu/ hour or hap)	Type (s) (rot. cup, gun, etc)	Type Fuel	Amt/yr. (barrels, gals, tons, cu.ft.)	Naximum Nourly Fuel Kater
YOTARY 1.72 WS OVEN	2		BASEMENT	180,000 BTU/HR	CONTINUOUS LINE	NATURAL GAS	174,000 W. FT.	175 CU. FT.
1707ARY 2.5.24/16-04FN	2		BASEMEUT	180,000 BTU/HR	CONTINUOUS L'INE	NATURAL GAS	174,000 CU.F.	175 CU.F.
3.	• ,	٠.		:	,			
4.	• • •	, ,		r			•	•

יף אתר 2.	OPERA	TING GC	HEDULE:	PART 3.	STACK/VENT D					•	
ilro. por day	Daya per week	par	Nonths in Operation	Stack No:	Stack Txit Direction (horiz-vert)	Inside Di- emeter at top (ft)	Height above grount (ft)	Exit nas Temp. (OF)	Quantity cascous discharge (acfs)	Exit velo- city (ft/ sec)	Does stack have rain cap?
1.4	5	50	12	VENT	VERTICAL	10 IN	30	_	U.	-ب	YE5
2. 4	5	50	12	H W	VERTICAL	· 1010	30.	~	_	U	YES
3.	,	٠.							• • •	,	
4.							1				

PART 4. PROVIDE A ROOF PLAN SHOWING LOCATION OF STACK(8) AND VENT(8).

CERTIFICATION:	I certify	that I	have	examined	the	information	on thi	в раде	and	that	to	the	best	of	MΑ	knowledge
it is true and	complete.	-		•												

SIGNED E. I mul fautt

TITLE Must Mag. DATE 12 177C

1. APPLICATION NO. | 2. STACK NO.

VISION OF I	ENVIRONMENT ROOM 320	TAL HEALTI BOST	H, BU ON,	REAU OF MASSACH	AIR QUALI USETTS 02	TY CONTROL, 6		TON S	TREET		•	,		111		
				LEGAL NAM	E			BUSI	NESS ADD	RESS (NO.	AND	STREET.	CITY. ZIP	CODE)		PHONE
IRM	1/2		1.13							7					7	7
IVISION	 	<u></u>				·			· · · · · ·							
PPLICANT																
ISTALLATION	VIIIIIIIIIIII															
QUIPMENT IG REGISTERED	TYPE OF EQUIPME	NT (e.g. Boiler,		leater)	1 .	NAME OF EQUIPMENT	MODEL NUM			ABER OF IDE	NTICAL FORM	(IF	POLLUTION Yes, File For YES	N CONTROL EQU m AP-4) 	IPMENT U	iED?
IAJOR IVITY OF FIRM	MFG.	OFFICE		RETAIL OR WHLSE, STORE	□ SCHO	HURCH HOTE	EL HOSPI	TAL [WARE-		ESIDEN		OTHER (Specify	·) .		•
TYPES OF FUEL USED	FUEL	GRADES		SULFUR CONTENT	ASH CONTENT	ANNUAL USAGE (Tons, Gals., or ft.3)	MAXIMU/ PE	ER UNIT				AL USE			. SUPPLIE	
			(x)			ļ	(Lbs., Gals., ft. ³ /l)r.) (BTU/hr.)	Month	Yr. to	Month	(r.	Name		City or Town
	COAL	Bituminous		%	. %	<u> </u>										
		Anthracite		. %	ı						-					
	on 🗗	Kerosene	T^{-1}	*			1			,	 					
		2	77	,, , %		1. 61.66.1	Month	1/2			 		delle	20 10 11	:	4000
		4		. %							 		1			
	1	5	1-1	. %							=					•
		6	+++	. %						_	<u> </u>					
			ikilliki							- 	 =	 				
	NAT. GAS			. %	. %	<u> </u>					ΙE		1			
UEL USAGE	% OF FUEL USED F	OR HEATING			% OF FU	EL USED FOR COOLING		%	OF FUEL US	ED FOR PO	WER .	;		% OF FUEL US	ED FOR PR	OCESS
URNER QUIPMENT	ARE OIL HEATERS	USED?			RATURE BEFORE		URNER MANUFACT		- (/				ISTALLATIO		IER MODE	L NO.
YPE OF COAL URNER	HAND FIRED	UNDERFEE STOKER	D	TRAVELING GRATE	6 □ c	HAIN SPREAL	DER STOK	ER WITH	GAS	CYCLC	NE		VERIZED			
YPE OF OIL URNER	PRESSURE OR GUN			ROTARY CUP	{	STEAM ATOMIZER	☐ AIR) MIŽER			ANGEN IRED	TIALLY		OTHE (Spec		
OMBUSTION	OVERFIRE AIR CON	HO NO				OF DRAFT FORCED IN	IDUCED □~N	ATURAL	TYPE OF	AIR FUEL	ratio (LOW			I-LOW FIRE		ID CONTROLLED
QUIPMENT	BREACHING GAS	116	۴,	DATE EQUIPME MONTH	NT WAS PUT IN	SERVICE FAR		POLLU	OF JANT	DATE OF TEST		RATE (Pou	OF EMISSIC nds Per Hou	ons (r)	ROUP CO	NDUCTING TEST
IFORMATION	EXHAUST GAS FLO	W RATE (ACFM	} 1	44 4 911411		!		ļ								
	STACK GAS VELOC	ITY IN FEET PE	SECO	ł	MENT OPERATIO		15. STACK TEST RESULTS									
	FACILITY OPERATI		AYS/W		JRS PER YEAR WEEKS/Y											
	STACK EXIT DIRECT			\$1	ZE OF STACK EX		STACK HEIGHT (F	EET)	IS ST	ACK EQUIP			AT? TE	MPERATURE AT	STACK EX	
'ACK	HORIZ.	VERT.	Inside	ROUND STACK	in. RE	CTANGULAR STACK				YES		NO	1			f
IFORMATION	SMOKE INDICATOR	R IN STACK A	AAKE A	ND MODEL NO	OF SMOKE IN	DICATOR	STACK LINING METAL			REFRACTO	DY		التا	OTHER (Specify	`	
ACK	NAME OF NEAREST		, <u>, ,</u>		<u>e sa estado</u> Español	<u> </u>	DISTANCE TO STA	ION:	<u>ب</u> د م دائد					OM INTERSECTIO	N (Cir	rcle one) E S SW W NW
	 	- 	1			,	SIGNED		<u>.</u>			TIT	E			DATE
RTIFICATION	I certify that I h knowledge it is General Statutes	true and com	plete,	(Signature su	bjects signer	t to the best of my to provisions of the										

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111 **ROOM 320** BOSTON, MASSACHUSETTS 02111 (617) 727-2658 LEGAL NAME BUSINESS ADDRESS (NO. AND STREET, CITY, ZIP CODE) PHONE 4 11 1 1 11 X 1 11 11 11 11 11 11 11 11 The Salliett St. Shire all all 1 30 31 IRM 1. IVISION PPLICANT **VISTALLATION** QUIPMENT TYPE OF EQUIPMENT (e.g. Boiler, Space Heater) BRAND NAME OF EQUIPMENT NUMBER OF IDENTICAL MODEL NUMBER AIR POLLUTION CONTROL EQUIPMENT USED? UNITS ON THIS FORM (If Yes, File Form AP-4) G REGISTERED 12.16/16 ☐ YES ∏~NO HOSPITAL AJOR RETAIL OR SCHOOL HOTEL/ WARE-RESIDENCE OTHER MFG. MOTEL OFFICE IVITY OF FIRM WHLSE, STORE OR CHURCH OR LAB HOUSE OR APTS. (Specify) MAXIMUM FIRING RATE TYPES OF SULFUR ASH ANNUAL USAGE SEASONAL USE FUEL SUPPLIER FUEL GRADES PER UNIT FUEL USED CONTENT CONTENT (Tons, Gals., or ft.3) (x)(Lbs., Gals., ft.3/hr.) (BTU/hr.) Month Yr. to Month Yr. Name City or Town Bituminous COAL Anthrocite Kerosene OIL 18 611 646 4 5 6 NAT. GAS OTHER % OF FUEL USED FOR COOLING % OF FUEL USED FOR POWER % OF FUEL USED FOR HEATING % OF FUEL USED FOR PROCESS UEL USAGE REAKDOWN ARE OIL HEATERS USED? OIL TEMPERATURE BEFORE INJECTION BURNER MANUFACTURER DATE OF BURNER INSTALLATION BURNER MODEL NO. URNER ☐ YES TYNO / ·// · / · * * QUIPMENT CYCLONE TRAVELING STOKER WITH GAS PULVERIZED YPE OF COAL HAND UNDERFEED CHAIN SPREADER URNER FIRED STOKER GRATE GRATE STOKER REINJECTION **FURNACE** COAL TANGENTIALLY ROTARY YPE OF OIL PRESSURE STEAM AIR ATOMIZER OTHER ATOMIZER CUP FIRED (Specify) URNER OR GUN TYPE OF AIR FUEL RATIO CONTROL SYSTEM OVERFIRE AIR CONTROL TYPE OF DRAFT ☐ HAND CONTROLLED OMBUSTION INDUCED ☐ YES □ NO ☐ FORCED ☐ NATURAL ☐ ON-OFF D LOW FIRE D-HIGH-LOW FIRE D. FULL AUTOMATIC DATE EQUIPMENT WAS PUT IN SERVICE TYPE OF DATE OF TEST RATE OF EMISSIONS BREACHING GAS GROUP CONDUCTING TEST (Pounds Per Hour) STATE YEAR QUIPMENT TEMPERATURE HINOM EXHAUST GAS FLOW RATE (ACFM): **IFORMATION** MAXIMUM 15. STACK TEST STACK GAS YELOCITY IN FEET PER SECOND EQUIPMENT OPERATING HOURS RESULTS HOURS BER YEAR FACILITY OPERATING HOURS DAYS/WEEK . WEEKS/YEAR HOURS/DAY STACK HEIGHT (FEET) IS STACK EQUIPPED WITH RAIN HAT? SIZE OF STACK EXIT TEMPERATURE AT STACK EXIT STACK EXIT DIRECTION ROUND STACK RECTANGULAR STACK D'NO . VERT. T YES HORIZ. 16 IACK Inside Diameter MAKE AND MODEL NO. OF SMOKE INDICATOR **IFORMATION** SMOKE INDICATOR IN STACK STACK LINING OTHER (Specify) ☑ YES ☐ METAL ☐ REFRACTORY DIRECTION FROM INTERSECTION NAME OF NEAREST (Circle one) DISTANCE TO STACK 'ACK INTERSECTING STREET FROM INTERSECTION: TO STACK: N NE E SE S SW W NW CATION TITLE SIGNED DATE I certify that I have examined the above information and that to the best of my ERTIFICATION knowledge it is true and camplete. (Signature subjects signer to provisions of the General Statutes regarding false and misleading statements).

VISION OF ENVIRONMENTAL HEALTH, BUREAU OF AIR QUALITY CONTROL, 600 WASHINGTON STREET

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PEGISTERED				RAND NAME OF EQUIPMENT			MODEL NUMBER			NUMBER OF IDENTICAL UNITS ON THIS FORM				AIR POLLUTION CONTROL EQUIPMENT (If Yes, File Form AP-4) YES -NO				NT USE	IT USED?						
IOR ITY OF FIRM	☐ M	FG.		OFFICE		RETAIL OR WHLSE, ST		SCHO		□ HOTI	EL/	HOSPIT OR LAB			WARE		RESI OR A	DENCI		OTI (Sp.					•
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727-5194

The Commonwealth of Massachusetts
Department of Environmental Quality Engineering
Metropolitan Boston Northeast Region
600 Washington Street, Boston, Ma. 02111
January 1978

Mailes

April 18, 1978

Gentlemen:

The Division of Air and Hazardous Materials must develop regulations limiting the quantities of volatile organic compounds emitted from sources in the Commonwealth in order to achieve compliance with applicable ambient air standards.

It is the Division's desire to develop regulations that will provide for the necessary reduction in volatile organic compound emissions without imposing undue economic hardship on the industries in the Commonwealth utilizing these compounds. Toward this end, the Metropolitan Boston Region must update its inventory of commercial and industrial facilities within the Region to determine the types and quantities of volatile organic compounds presently being utilized.

The Region has determined that the nature of operations at your facility involves the use of volatile organic compounds. Your cooperation is requested in completing all applicable parts of the enclosed questionnaire. This is a requirement of the Department's Regulation 12, Registration, Record Keeping and Reporting, of the "Regulations for the Control of Air Follution in the Metropolitan Boston Air Pollution Control District".

You are requested to complete and return the form within thirty (30) days. If you have any questions or need assistance, please do not hesitate to call, telephone number 727-4609.

Thank you in advance for your cooperation.

Very truly yours,

John C. Desmond

John A. Desmond Chief Air Quality Control Section

C- MBAPCD C- R.E.E.

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING DIVISION OF AIR AND HAZARDOUS MATERIALS

PORM FOR THE REGISTRATION OF HYDROCARBON EMISSIONS

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Please complete ar				
Air Quality Control Req A. 02111. Should you				ton, ÷
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Comapny Name EMERS	ON & CUMING	INC-		· ·
Plant Address 869 U	JASHINGTON.	ST, CANTON	U.MASS -	02021
Mailing Address	//	(((,)	
Contact JOHN HA	GEN Title SI	AFETY DIK	PECTOR	· · · · · · · · · · · · · · · · · · ·
Telephone Number 828-	3300			*
Approximate number of e	employees at this	Dlant address	85	
Rormal Operating Schedu	mle of this facil	ity 8 hr/day	S days/wk.	52MAX
Indicate the percentage	; e of annual produ	tion produced	d per quarte	ura 🧍
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How many gallons of mat	terial containing	volatile hyd	rocarbons si	ch as cleaning
fluids, coatings, adher				this facility
annually? 6000 + 6	AC ASSORTE	D SOLUEN	VIS	
Supplier	Address of	Supplier	Тур	of Materials
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DOF & INGALLS-2	5 COMMERCIAL S	I. MEDFORD.	MASS	TOLVENE
VEW EXGLAND CHEM	11CAC-P.O.Box 38,	MERRIMACK, NH	HIJI TRICE	YLOROETHAL
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CERTIPICATION to be sign	gned by mesponsib	le corporate o	official: I	certify that
Mave examined the info	rmation on this f			
it is true and complete				
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INSTRUCTIONS

Everyone receiving this form should complete the first page and only those other sections pertaining to their company.

The information submitted should pertain to calendar year 1977 operations.

If the space provided is not adequate, feel free to either copy the form, use a separate sheet or request an additional copy.

Information contained in the Division's files is available to the general public upon request under the provisions of the Freedom of Information Act. Contact the Division (727-4609) immediately if you feel that completion of information requested would compromise proprietary data.

Supply a schematic of your facility indicating the location of all stacks and vents that emit volatile organic compounds.

Please supply as much information as possible to enable accurate calculations to be made and an accurate survey to be conducted.

<u>Please</u> also indicate if you have substituted compounds or installed control equipment in order to comply with the provisions of existing regulations.

STACK IMPORMATIONAND HYDROCAPBON CONTROL IMPORMATION

Complete the table below for all stacks which exhaust volatile organic compounds and for all hydrocarbon collection equipment. Number the sources to agree with data submitted on the following pages of this form.

Stack data need not be submitted for stacks which do not emit hydrocarbons

				Hydrocarbo Control E		Stack Information						
Source No.	Process of Operation	Type of Process Equipment	of	Type of Control	Estimated Control Efficiency	Exit Height above Ground (feet)	Inside Dia. (ft.)	(ola) Lean Lean	Exhaust flowrate (CPM)	Stack Exit Velocity (ft./s)		
/	PRODUCT. FORMULATION	MIXERS	8	EXHAUST SYSTEM	90%	60	10"	AMB'	UUKNAWN	UNGWOWN		
2	CLEAN PIPING		3	EXHAUST SYSTEM	90%	8	NA	AMB	UNKNOWA	UNKNOWN		
3	R\$D	,	NA	EXHAUST SYSTEM	90%	S	NA	ARIÓUS	11	t,		
4.	FORMULATION MOLITING	MIXERS/MOLDS	3	EXHAUST SYSTEM	90%	20	6"	AMB	2.0	٤,		
<u>5</u>	FORMULA TION	/	5	EXHAIST	90%	18	NA	AMB	11	(,		
6	FORMULATION SMALL AMTS	MIXERS	5	EXHAUST	90%	18	8"	AMB	<i>'</i> .	"		
7	PAINTSPRAY	SPRAY	1	BOOTH EXHAUST	90%	12	NA	AMB	l.	4		
8	FORMULATION PACKAGING	MIXER	1	EXHAUST SYSTEM	190%	15	NA	AMB		٠,		
9	FORMILA TION	MIXERS	6	EXHAUST SYSTEM	2000	50	NA	AMB	1.	/1		
							,					

COLUMN HEADED. TYPE OF CONTROL DEVICE: ENTRY INDICATES ONLY THAT HYDROCARBON VAPORS ARE EXHAUSTED TO ATMOSPHERE.

SURFACE COATING

Complete this sheet for all painting, printing, treating or coating of paper, metals, fabric, etc. in which hydrocarbons are used. Should additional space be needed for reporting, submit addendum.

Source Number	Material being coated	Estimated Amount of Material Coated Annually	Coating Method Used	Type of Coating Applied	Amount of Coating applied/year in Pounds or Gallons
	ABSORBERS	NEGLIGIBLE. Rap oferation	SPRAY	PLASTIC COMPOUNDS	2.5 GALS
 					
					

SURFACE COATING

Temperature at Which coating is applied or cured	Type of Solvent in Undiluted Coating	Wt. Solvent in Undiluted Coating	Type of Solvent added to Coating	Amount of Solvent added per year, pounds or gallons
		-		
		-		

How much,	if any,	solvent i	ls shipped out	for recovery	or disp	sal?	500	gal/yr.	
What type	(s) of c	leaning so	olvent is(are)	used? METH	MENE C	HORIO	5/1/1/1 TK	CICHLO ROETHA	4NE
			is used per ye						

CLEANING, DEGREASING AND/OR DRYCLEANING

Complete this page for operations such as cold solvent cleaning, hot solvent cleaning and vapor degreasing. Stoddard solvent, 1,1, 1 trichloroethane, perchloroethylene, methylene chloride and trichloroethylene are examples of solvents that must be reported.

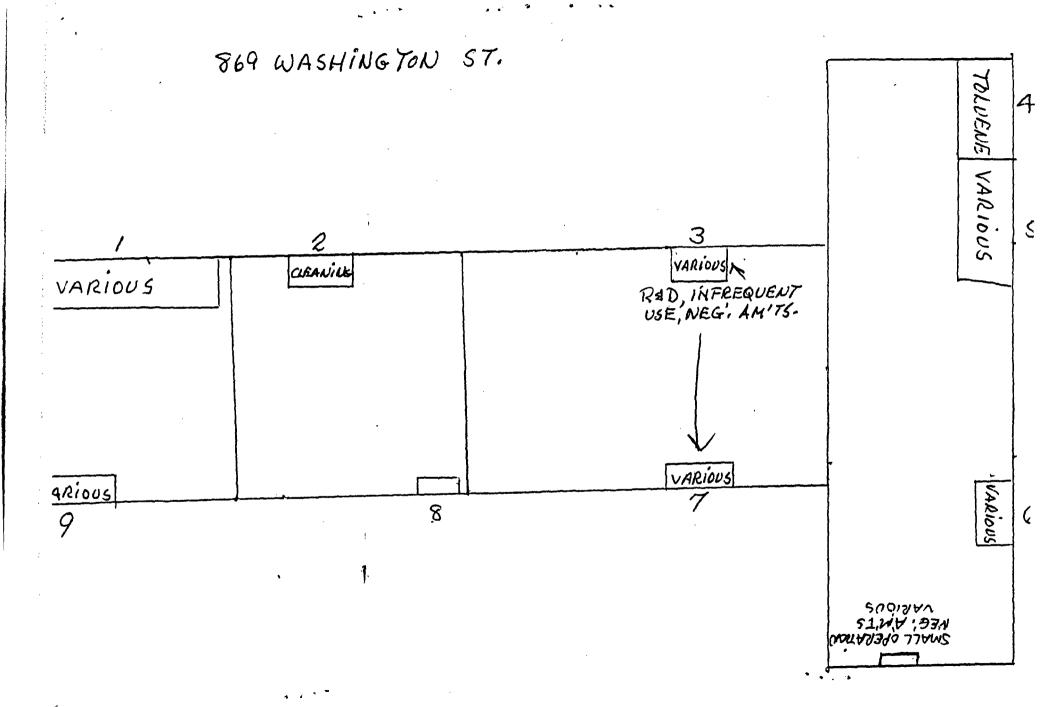
Source Number	Operation	Type of Material Treated	Pounds of Material Treated Annually	Type of Solvent Used	Gallons Used Annually
R	RESIN SYSTEM PIPING CLEANING	RESIN SYSTEM TRANSFER PIPING	N/A	METHYLENE CHLORIDE	200
3/6	CLEANING DECREASING	PARTS CLEANUS	10,000	II, I TRICHLOROETHAN	55 GA

T	•		l .	1						
Temperature of Solvent in Use. OF.		Type of Emission Control Device				Control Device Control Effici		Waste Solve Disposal Me		Gallons of Solven Disposed of Annually
AMB.	EXHAUST	SYSTEM	90%	LICENSED	DISPOSAL	200				
AMB		"	90%	ø.c		50				
				_						
	,									

Complete the sheet for all operations which utilize hydrocarbons as a raw material or which produce an end product containing hydrocarbons.

Brief Description of Process ALL ARE VARIOUS COMBINATIONS OF FORMULATION / MIXING/
MOLDING AND/OR PACKAGING

No.	Process or opera- ion using hydro- carbons	Type of Material Processed		Type & Weight of Violatile hydro- carbons in processed material	Countity of Valatile Hydro- carbons loct to Atmosphere during process- ing 1b/yr.	Method Used to determine Emission (es (cot. or
1	FORMULATION. MIXÍNG PLASTICS	HESINS	750,00014	32,000 · lbs	640	'esT
3	RAD	PLASTICS	NEGLIGIBLE		~	
4	FORMULATION, MIXING/MOLDING	PLASTIC. FOAMS	er andreway and the second of the second	Piller of Anthonorous Section 18 april	en in the second	
5	FORMULATION / MIKING MOLDING	RESTN		INCLUDED IN	INCLUDED IN SOURCE NOT ABOVE	es-
6	FORMULATION MIXING	RESIN	NEGLIGIBUE			
7	SPRAY	MICROWAUE	NEGLIGIBLE RIMARKY RAD	general Beneral was a superior service of the state of the service of the service of the service of the service of the		
8	FORMULATION. MINING PACKAGING	RESIN GYSTEMS	SMACL AMOUNTS	PART OF NOI ABOVE	INCLNOED AS PARTOF GYOULOSS	
9	FORMULATION MIKING	RESIN	INCLUDED IN	L INCLUDED IN SOURCE NO. 1 ABOUG	JACLUDED IN	C57



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L DIVISION	ERIE	aso.	V F C	UA	MING.	INC		A S	79	MAL	POLE	ST,		INZ	7A,	0202	-	121	-3300
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ACTIVITY OF FIRM	☐ MFG.		OFFICE		RETAIL OR WHLSE, STOR	E D SCHO	DOL HURCH M	OTEL/	☐ HOSPITAL OR LAB	(4)	WARE- HOUSE	☐ &	R APTS	CE [OT (Sp	HER ecify)			
. TYPES OF	FUEL	ī]	GRADES		SULFUR CONTENT	ASH ,	ANNUAL USAG		MAXIMUM F	UNIT	ATP	-	ASONA				FUEL SL	JPPLIER .	
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EQUIPMENT	BREACHING TEMPERATU		413	F. W.		ENT WAS PUT II	SERVICE	. It	VALUE OF	TYPE OF		ATE OF TEST			OF EM unds Pe	ISSIONS r Hour)	GRO	UP CONDU	CTING TEST
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INFORMATION	SMOKE INDIC			AKE	AND MODEL NO	OF SMOKE IN	DICATOR		TACK LINING		RE	FRACTO				OTHER	(Specify)	A CONTRACTOR	
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% OF FUEL	USED FOR HEATI	10	an		EL USED FOR COOLING	Kenny Kir sa like Alles	% OF FUEL USED	FOR POWER	1 2 million	%	OF FUEL USED P	OR PROCESS
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ARE OIL HE YES HAN FIRE PRES OR	D UNDE STOKE	NO S	TRAYELII GRATE	% OF FU	E IUSED FOR COOLING INJECTION F HAIN SPREAM STEAM ATOMIZER	DER STOKER	WITH GAS TION	CYCLONE FURNACE TANG	PULN COA	STALLATION VERIZED	BURNER OTHER (Specify)	MODEL NO.
ARE OIL HE YES HAN FIRE PRES OR	D UNDE	NO S	TRAVELING GRATE	* OF FU	ELUSED FOR COOLING EINJECTION F HAIN SPREAL RATE STOKE	DER STOKER REINJEC	WITH GAS TION	DATE OF	PULY COA	STALLATION VERIZED	BURNER OTHER (Specify)	MODEL NO.
ARE OIL HE YES HAN FIRE OR OVERFIRE YES BREACHIN	D UNDE STOKE SURE GUN IR CONTROL NO G GAS	NO RFEED R	TRAYELING GRATE ROTARY CUP DATE EQUIPME	* OF FU	E IUSED FOR COOLING INJECTION F HAIN SPREAI RATE STOKE STEAM ATOMIZER FORCED I SERVICE	DER STOKER REINJEC AIR ATOM	WITH GAS CTION IZER TYPE OF AI URAL ON-OF	CYCLONE FURNACE TANGE FIRED R FUEL RATIO	PULY COA ENTIALLY CONTROL W FIRE	% STALLATION VERIZED L SYSTEM I HIGH-LOV OF EMISSIONS	BURNER OTHER (Specify)	MODEL NO.
ARE OIL HE YES HAN FIRE OR OVERFIRE YES BREACHIN TEMPERAT	D UNDE STOKE SURE GUN IR CONTROL NO	NO RFEED R	TRAYELING GRATE ROTARY CUP DATE EQUIPME	NG CONTRACTOR OF THE CONTRACTO	E IUSED FOR COOLING INJECTION F HAIN SPREAI RATE STOKE STEAM ATOMIZER FORCED I SERVICE	DER STOKER REINJEC AIR ATOM	WITH GAS CTION IZER TYPE OF AI	CYCLONE FURNACE TANGO R FUEL RATIO	PULY COA ENTIALLY CONTROL W FIRE	STALLATION VERIZED L SYSTEM HIGH-LOV	BURNER OTHER (Specify)	MODEL NO.
ARE OIL HE YES HANFIRE OR OVERFIRE YES BREACHIN TEMPERATI EXHAUST G NORMA	D UNDED STOKE SURE GUN IR CONTROL INO D GAS IRE	NO RFEED R	TRAVELING GRATE ROTARY CUP DATE EQUIPME MONTH	RATURE BEFORE RATURE BEFORE TYPE TYPE TYPE MY MAS PUT IN Y	E USED FOR COOLING INJECTION F HAIN SPREAM ATOMIZER FORCED I SERVICE EAR	DER STOKER REINJEC AIR ATOM DUCED NATI	WITH GAS CTION IZER TYPE OF AI	CYCLONE FURNACE TANGO R FUEL RATIO	PULY COA ENTIALLY CONTROL W FIRE	% STALLATION VERIZED L SYSTEM I HIGH-LOV OF EMISSIONS	BURNER OTHER (Specify)	MODEL NO.
ARE OIL HE YES HAN FIRE OR OVERFIRE A YES BREACHIN TEMPERATI EXHAUST G NORMA STACK GAS	D UNDED STOKE SURE GUN IR CONTROL INO IR GAS IRE AS FLOW RATE (J VELOCITY IN FEE	NO RFEED R CFM) T PER SECC	TRAVELING GRATE ROTARY CUP DATE EQUIPME MONTH MAXIMU OND EQUIP	RATURE BEFORE RATURE BEFORE TYPE TYPE TYPE MY MAS PUT IN Y	E USED FOR COOLING INJECTION F HAIN SPREAM ATOMIZER OF DRAFT FORCED I SERVICE EAR IG HOURS	DER STOKER REINJEC AIR ATOM	WITH GAS CTION IZER TYPE OF AI	CYCLONE FURNACE TANGO R FUEL RATIO	PULY COA ENTIALLY CONTROL W FIRE	% STALLATION VERIZED L SYSTEM I HIGH-LOV OF EMISSIONS	BURNER OTHER (Specify)	MODEL NO.
ARE OIL HE YES HAD FIRE OR OVERFIRE YES BREACHIN TEMPERATI EXHAUST G NORMA STACK GAS	D UNDED STOKE SURE SUN IR CONTROL NO GAS IRE AS FLOW RATE (A) VELOCITY IN FEE	NO RFEED R CFM) T PER SECC	DATE EQUIPME MONTH MAXIMU OND EQUIP	RATURE BEFORE NG G TYPE PF G NT WAS PUT IN MENT OPERATIO	E USED FOR COOLING INJECTION F HAIN SPREAM ATOMIZER FORCED SERVICE BAR G HOURS	DER STOKER REINJEC AIR ATOM DUCED NATI	WITH GAS CTION IZER TYPE OF AI	CYCLONE FURNACE TANGO R FUEL RATIO	PULY COA ENTIALLY CONTROL W FIRE	% STALLATION VERIZED L SYSTEM I HIGH-LOV OF EMISSIONS	BURNER OTHER (Specify)	MODEL NO.
ARE OIL HE YES HAD FIRE OR OVERFIRE YES BREACHIN TEMPERATI EXHAUST G NORMA STACK GAS	D UNDE STOKE SURE GUN IR CONTROL INO G GAS JRE AS FLOW RATE (VELOCITY IN FEL PERATING HOURE DAY 244	NO RFEED R CFM) T PER SECC	TRAVELING GRATE ROTARY CUP DATE EQUIPME MONTH MAXIMU OND EQUIP HOL	RATURE BEFORE NG G TYPE PT ST G NT WAS PUT IN MENT OPERATIN URS PER YEAR	HAIN SPREAM ATOMIZER FORCED IN SERVICE FAR AG HOURS IG HOURS	DUCED AIR ATOM DUCED NATI	WITH GAS TION IZER TYPE OF AI URAL ON-OF TYPE OF POLLUTANT	CYCLONE FURNACE TANG FIRED R FUEL RATIO F D LO DATE OF TEST K EQUIPPED W	PULY COA ENTIALLY CONTROL W FIRE RATE C COUTH	% STALLATION VERIZED L SYSTEM I HIGH-LOV OF EMISSIONS rds Per Hour)	BURNER OTHER (Specify)	MODEL NO. I HAND CONTROL FULL AUTOMATIC UP CONDUCTING TE
ARE OIL HE YES HAN FIRE OR OVERFIRE YES BREACHIN TEMPERATI EXHAUST G NORMA STACK GAS FACILITY O HOURS/	D UNDE STOKE SURE SUN IR CONTROL INO O GAS IRE AS FLOW RATE (I) VELOCITY IN FEE DAY DERATING HOURS DAY DIRECTION IZ. VER	NO RFEED R CFM): T PER SECC	DATE EQUIPME MONTH MAXIMU OND EQUIP HOI WEEK Z SI ROUND STACK Se Diameter	RATURE BEFORE RATURE BEFORE TYPE TYPE TYPE WENT OPERATIN URS PER YEAD WEEKS/Y ZE OF STACK ED	HAIN SPREAM ATOMIZER OF DRAFT FORCED IN SERVICE LAR LIG HOURS LIT CTANGULAR STACK	DER STOKER REINJEC AIR ATOM DUCED NATI	WITH GAS TION IZER TYPE OF AN URAL ON-OF TYPE OF POLLUTANT	CYCLONE FURNACE TANG FIRED R FUEL RATIO F D LO DATE OF TEST K EQUIPPED W	PULY COA ENTIALLY CONTROL W FIRE RATE C COUTH	% STALLATION VERIZED L SYSTEM I HIGH-LOV OF EMISSIONS rds Per Hour)	OTHER (Specify) V FIRE GRO	MODEL NO. I HAND CONTROL FULL AUTOMATIC UP CONDUCTING TE
ARE OIL HE YES HAN FIRE OR OVERFIRE YES BREACHIN TEMPERATI EXHAUST G NORMA STACK GAS FACILITY O HOURS STACK EXIT HOR	D UNDE STOKE SURE SUN IR CONTROL INO O GAS IRE AS FLOW RATE (I) VELOCITY IN FEL PERATING HOURS DAY 246 DIRECTION IZ. YER CATOR IN STACE	NO RFEED R CFM): T PER SECC	TRAVELING GRATE ROTARY CUP DATE EQUIPME MONTH MAXIMU OND EQUIPME HOTO WPEK 7	RATURE BEFORE RATURE BEFORE TYPE TYPE TYPE WENT OPERATIN URS PER YEAD WEEKS/Y ZE OF STACK ED	HAIN SPREAM ATOMIZER OF DRAFT FORCED IN SERVICE LAR LIG HOURS LIT CTANGULAR STACK	DER STOKER REINJEC AIR ATOM DUCED NATI	WITH GAS TION IZER TYPE OF AI URAL ON-OF TYPE OF FOLLUTANT	CYCLONE FURNACE TANG FIRED R FUEL BATIC F DATE OF TEST K EQUIPPED W	PULNER IN COA ENTIALLY CONTROL W FIRE RATE (Pow	STALLATION VERIZED L SYSTEM I HIGH-LOV OF EMISSIONS rids Per Hour) TEMPER	OTHER (Specify) V FIRE GROI	MODEL NO. I HAND CONTROL FULL AUTOMATIC UP CONDUCTING TE
ARE OIL HE YES HAN FIRE OR OVERFIRE YES BREACHIN TEMPERATI EXHAUST GE NORMA STACK GAS FACILITY O HOURS HOURS STACK EXIT HOR	D UNDE STOKE SURE SUN IR CONTROL INO O GAS IRE VELOCITY IN FEL VELOCITY IN FEL PERATING HOUR: DAY 24 DIRECTION IZ. VER CATOR IN STACE INO	NO RFEED R CFM): T PER SECC	DATE EQUIPME MONTH MAXIMU OND EQUIP HOI WEEK Z SI ROUND STACK Se Diameter	RATURE BEFORE RATURE BEFORE TYPE TYPE TYPE WENT OPERATIN URS PER YEAD WEEKS/Y ZE OF STACK ED	HAIN SPREAM ATOMIZER OF DRAFT FORCED IN SERVICE LAR LIG HOURS LIT CTANGULAR STACK	DER STOKER REINJEC AIR ATOM DUCED NATI STACK TEST RESULTS STACK HEIGHT (FEET	WITH GAS TION IZER TYPE OF AI URAL ON-OF TYPE OF POLLUTANT IS STAC	CYCLONE FURNACE TANG FIRED R FUEL RATIO F D LO DATE OF TEST K EQUIPPED W	PULNER IN COA ENTIALLY CONTROL W FIRE RATE (FOW)	% STALLATION VERIZED L SYSTEM HIGH-LOV OF EMISSIONS rds Per Hour) TEMPER OTHER OTHER COTHER COTHER	OTHER (Specify) ATURE AT STACER (Specify) ER (Specify)	MODEL NO. I HAND CONTROL FULL AUTOMATIC UP CONDUCTING TE
ARE OIL HE YES HAN FIRE OR OVERFIRE YES BREACHIN TEMPERATI EXHAUST G NORMA STACK GAS FACILITY O HOURS STACK EXIT HOR	D UNDE STOKE SURE SUN IR CONTROL INO O GAS IRE VELOCITY IN FEL VELOCITY IN FEL PERATING HOUR: DAY 24 DIRECTION IZ. VER CATOR IN STACE INO	NO RFEED R CFM): T PER SECC	DATE EQUIPME MONTH MAXIMU OND EQUIP HOI WEEK Z SI ROUND STACK Se Diameter	RATURE BEFORE RATURE BEFORE TYPE TYPE TYPE WENT OPERATIN URS PER YEAD WEEKS/Y ZE OF STACK ED	HAIN SPREAM ATOMIZER OF DRAFT FORCED IN SERVICE LAR LIG HOURS LIT CTANGULAR STACK	DER STOKER REINJEC AIR ATOM DUCED NATI	WITH GAS TION IZER TYPE OF AI URAL ON-OF TYPE OF POLLUTANT IS STAC	CYCLONE FURNACE TANG FIRED R FUEL BATIC F DATE OF TEST K EQUIPPED W	PULNER IN COAR ENTIALLY CONTROL W FIRE RATE (Pour In	STALLATION VERIZED L SYSTEM HIGH-LOV OF EMISSIONS dis Per Hour) TEMPER OTHE ECTION FROM INITACK:	OTHER (Specify) ATURE AT STACER (Specify) ER (Specify)	MODEL NO. I HAND CONTROL FULL AUTOMATIC UP CONDUCTING TE
ARE OIL HE YES HAMPERATION PRES OVERFIRE YES BREACHIN TEMPERATI EXHAUST G NORMA STACK GAS FACILITY O HOURS STACK EXIT HORS SMOKE IND SMOKE IND NAME OF INTERSECTI	D UNDED STOKE SURE SUN IR CONTROL IR CONTROL O GAS IRE AS FLOW RATE (J VELOCITY IN FEL PERATING HOURS DAY	NO RFEED R CFM) T PER SECC DAYS/ Winste	DATE EQUIPME MONTH MAXIMU OND EQUIP BOUND STACK de Diameter AND MODEL NO	RATURE BEFORE RATURE BEFORE OF STACK EN TYPE	HAIN SPREAM ATOMIZER OF DRAFT FORCED IN SERVICE LAR LIG HOURS LIT CTANGULAR STACK	DER STOKER REINJEC AIR ATOM DUCED NATI STACK TEST RESULTS STACK HEIGHT (FEET	WITH GAS TION IZER TYPE OF AI URAL ON-OF TYPE OF POLLUTANT IS STAC	CYCLONE FURNACE TANG FIRED R FUEL BATIC F DATE OF TEST K EQUIPPED W	PULNER IN COA ENTIALLY CONTROL W FIRE RATE C (Powr IN I	STALLATION VERIZED L SYSTEM HIGH-LOV OF EMISSIONS dis Per Hour) TEMPER OTHE ECTION FROM INITACK:	OTHER (Specify) ATURE AT STACER (Specify) ER (Specify)	MODEL NO. I HAND CONTROL FULL AUTOMATIC UP CONDUCTING TE

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- AP-2 A. Process/Manufacturing Equipment
 - E. Process Fuel Furning Equipment

OFFICIAL USE ONLY

DATE INSPECTED | DATE REJECTED | ACKNOWLEDGED

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A. PROCESS/MANUFACTURING EQUIPMENT (see instructions, page 2 and 3)

APPLICATION NUMBER

		•	1	Type			LOCATI		RAW	MATERIAL	<u>S</u>		FINISHED	MATERIALS	
	Steps Froce	Involv	red	Equip Used	ment ·		EQUIPM Bldg		-	Type	Max/	Total/ Year	Type	Max/ DAYx	Total /
	Ceran	nic		Rotar Ovens	y (3)	2		Baseme		ly Ash	ea,	ea. ov		3000 1	
· MZOZ	<u>ospiic</u>			<u> </u>	-\-										1
	·····														-
ART 2.	OPER	ATING S	CHEDU	ILE P	ART 3.		VENT								
Hrs. per day	Days per week	Wks. per yr.	Mont in Oper	hs etion	Stack No.			anet	ide di- ter at (ft)	above ground (ft.)	Temp.	Quantity Gaseous Discharg (acfm)	Velo-	Does Stac have rain cap?	
4 ea	· 5	50	12		1,2,&3	Vert	111	14"		1&3-40! 2-30'	NA	NA ~~	·	Yes	
•				•	,	_Stack	:s	1,2,	&3	for s	team es	cape	,		
•										٠ ,					
ART 4.	PROC	ESS EMI	SSION	S		·	· 		PART	5. EMIS	SION CON	TROL SYSTE	M, IF APPLIC		
Stac Numb	1	Type		ntamin tted	ant (s)	!		unt tted /yr.		Type	Manuf	acturer	Percent Efficiency	Date of Installa	•
		Fly As	h Du	st				1	Dust Colle	ctor	Deltai	r	98%	2/1978	
)				•											,
		: I ce				examine	ed the	inform	nation		page and	that to t	he best of m	y knowledge ATE:	

B. PROCESS FUEL BURNING EQUIPMENT (see instructions, page 5)

PART 1. EQU Type	IPMENT DA	TA: LOCATION	Size of Unit	BURNER	FUEL DATA			••••
Equipment Used	Plant	F EQUIPMENT	(Indicate Btu/	Type (s) (rot. cup, gun, etc)	Type Fuel	Amt/yr. (barrels, gals tons, cu.ft.)	Maximum Hourly Fuel Rate:	· ··· .
Rotary 1 Drying Ov	en 2	Basem	ent 180,000 BTU/h	r Contingus Line	Naturel Ga		ft 175 c	u ft
2. "	2	11	"	11	11	tt	11	
3. "	2	11	,,	11	11	11	11	,
						·	: .	

PART 2.	OPER/	ATING :SO	CHEDULE:	PART 3	. STACK/VENT D				· · · · · · · · · · · · · · · · · · ·			
Hrs. per day	Days per week	per	Months in Operation	Stack No:	Stack 3xit Direction (horiz-vert)	Inside Di- ameter at top (ft)	Height above grount (ft)	Exit gas Temp. (OF)	Quantity gaseous discharge (acfu)	city	Poes stack have rain cap?	
1. 4	5	50	24	1	Vert.	14"	40'				Yes	📞 •
2. 4	5	50	24	2	11	14"	30'				**	`
3. 4	5	50	1	3	11	14"	40"		STEAM ESCA	PE.	** .	
4.		·		1					•			

PART 4. PROVIDE A ROOF PLAN SHOWING LOCATION OF STACK(a) AND VENT(a).

CERTIFICATION: I certify that I have examined the information on this page and that to the best of my knowledge, it is true and complete.

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AP-5 LIQUID ORGANIC MATERIAL STORAGE

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LIQUID ORGANIC MATERIAL STORAGE (see instructions, page 2)

PART 1. MATERIAL STORAGE	ATAC .		APPLICATION	NC.		,
MATERIAL BEING STORED	Annual Thruput (gals)	TYPE OF STO CONTAINER drum, etc.	(tank,	Size of Container (gals)	Number of Identical Containers	Location of Con- tainer (Inside or outside of bldg)
1. Resin 828	35,000	Tank	4	000	7	6 outside 1 inside
2. Resin (Epoxite 8)	7,000	Drum		55	128	Outside
3.						
PART 2. STACK/VENT DATA TYPE OF COVER ON CONTAI (none, floating roof, of with vent to atmosphere closed with vapor recove system, other (specify)	closed area is itens: Vent Ex	ATA: If contain served by an and it Direction ntal-vertical)				EMISSION FATE
1. Closed Vented	Verti	cal	yes	8'	Unknown	Unknown
 3. 4. 						
CERTIFICATION: I certify it is true and complete. SIGNED:	that I have ex	kanined the info	ormation on	this page and t	•	of my knowledge,

BOILER [RESIN TANK ARSIN TANKS BAG FILTER CKLANE OF DUST COLLECTOR PLANT 2 59 WALPOLE ST.

AP-5 LIQUID ORGANIC MATERIAL STORAGE

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LIQUID ORGANIC MATERIAL STORAGE (see instructions, page 2)

APPLICATION NUMBER

			NUMBER			
PART 1. MATERIAL STORAG MATERIAL BEING STORED	E DATA Annual Thruput	TYPE OF STO	•	Size of Container	Number of Identical	Location of Con- tainer (Inside or
IMIBRID BEING OF CLE.	(gals)	drum, etc.		(gals)	Containers	outside of bldg)
1. Resin 828	20,000	Tank	40	00 4		Inside
2.						
3.						
4. PART 2. STACK/VENT DATA						,
(none, floating roof, with vent to atmospher closed with vapor reconsystem, other (specify	e, <u>itens:</u> very Vent Ex	served by an are it Direction natal-vertical)	Does vent have rain cap?	Height above ground (ft)		ENTISSION FATE
1. Vented	Horizo	ontal	NA_	10	Unknown	Inknown !
2.						
3.	!					
4. `	1					
CERTIFICATION: I certifit is true and complete.	y that I have ex	kanined the info	ormation on	this page and t	hat to the best	of my knowledge,
SIGNED:			TITLE:		DAT	E:
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DATE RECEIVED	APPLICATION NUMBER	COORDINATES'
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AP-2 A. Process/Manufacturing Equipment

E. Process Fuel Eurning Equipment

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A. PROCESS/MANUFACTURING EQUIPMENT (see instructions, page 2 and 3)

APPLICATION NUMBER

		IPMENT D		Type		Ī	OCAT	ON	RAW	MATEP, IAI	S	• :		FINISHED	MATERIALS	
Major	Step	s Involv	ed	Equip	ment ·	OF I	QUIPN	ENT			Max	z/ To	tal/		Max/	Total
Iñ	Froc	ess	• •	Used		Plant	Bldg	Floor		Type	Hot	ır Ye	ar	Type	Hour,	Year
l. Dny	ing N	licroba	1100	ns_Ov	zen	1	1	Baseme	ent F	Glass Balloons				Micro Balloons	60_1bs	ח, ממד
2. Mfg	. Fee	d Stoc	<u>k</u>	Spray	Dryed	1	_5_	1_	Sodi	lum sili c acid	lcate water	.60 gal	30	Fee	d ck 1851)	s 75,0
3. Mfg	. Gla	ss Bal	loor	Sfurr	oning	- 1 - 0 m + 0 v	5	<u>182 c</u>	1	ed Stock	· ·			Micro Balloons		350,00
MART 2.		RATING S	Mon		ART 3.	STACK, Stack			de di-	17-4-14	Gas	7 0	A	Exit	Does Stac	
Hrs.	Days per	Wks.	in		Stack	direct			er at	Height above	Temp		tity	Velo-	have rain	
day	week			ration		(horiz			(ft)	ground (ft.)	1	Disc	harge fm)	l i	cap?	· ·
. 8	.3′	52	12		10	Horiz		6"x6	311	10'	450°		W /		NA	
2. 8	1	52	12			ŞEE :	PART	4 BELO)W -]	TEM 2	<u> </u>			: "	· · · · · · · · · · · · · · · · · · ·	
3. 8 PART 4.	5&3_	52 CESS EMI	12	NC.		11	11	,, ,,	DADE	- ''	(4.70V 66	NAME OF THE OWNER OWNER OF THE OWNER			7.1.7	••
PAI 4.	120	CESS FIGT	2210			 	Ame	unt	PART	J. EMIS	SION CC	MIKOL S	YSTEM.	IF APPLICA	Date	
Stac! Numb		Туре		ontamin itted	ant (s)		Emi	tted /yr.		Type	Manu	facture		Percent Efficiency	· of Installa	•
. 10		Flue G	ıs		,										·	
• NA		Partic	ılat	es (Gl	ass)	less 0.11	than		Bagho	use(2)	Tori	Div. ldson C		99.9%	1974	
· NA	,,			11		11	t ·	1	11	(3)		11		99.9%	1975	
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B. PROCESS FUEL BURNING EQUIPMENT (see instructions, page 5)

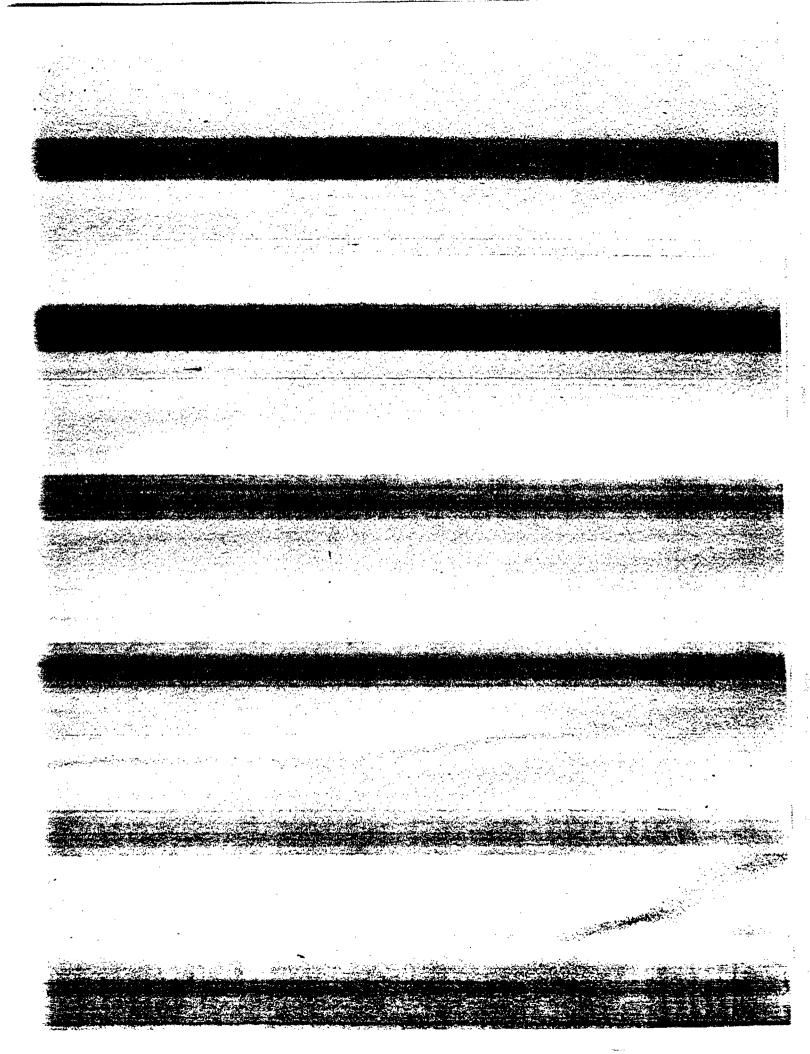
Тур	6		LOCATI	ON	Size of Unit	BURNER		FUEL DATA		
Equipm	ent	. 01	FOUIF	MENT	(Indicate Btu/	Type (s)	· {	Type	Amt/yr.	Maximum'
Use	:d .	Plant	Bldg	Floor	hour or hsp)	(rot. cup, gun, etc)		Fue1	(barrels, gals, tons, cu.ft.)	Hourly Fuel Rate:
Dryi:		1	1	Base- ment	800,000 BTU/HR	Atmospheric To	rch	Natural Gas	1,300,000 cu	t 723 cu.ft
Spra 2. Drye		1	5	1	1.250.000 BTU/HF	11 . 11		11 11	476,000 cu.f	: 1190 cu f
Ball 3. Furn	oonin ace	g 1	5	1	310.000 BTU/HR	11 11		11 11	7,085,700 cu.:	t 1770 cu.f
Ballo Furna		1	5	:	310,000 BTU/HR	11 11		11	1,400,000 cu.	t. 1180 cuft
PART 2.	OPERA	TING SCI	HEDULE:	P.	ART 3. STACK/VENT	DATA:	. 19			
Hrs.	Days	Wica	Month	ns S	tack Stack Exit	Inside Di-	Heig	ht Exit	Quantity Exit	Does
per	per	per	in	. }	No: Direction		abov	e gas	gaseous velo	stack ·
day	week	yr.	Opera	ition	(horiz-vert)	top (ft)	grou	int Temp.	discharge city	have

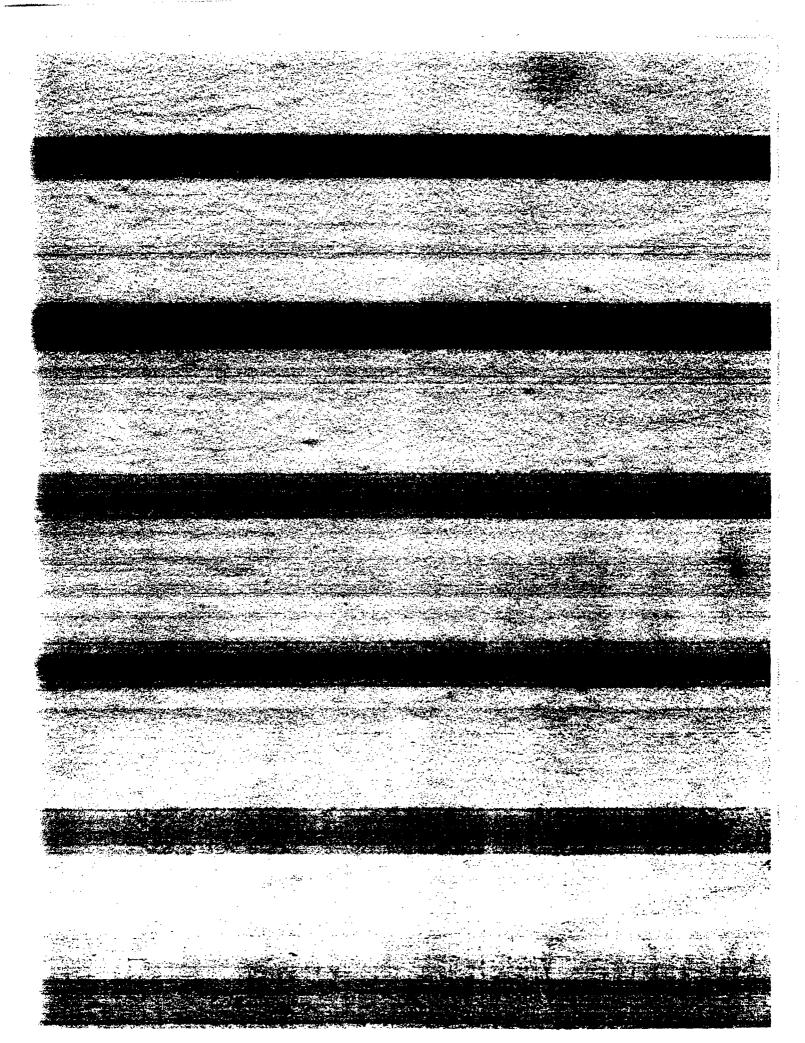
PART 2.	OPER	TING SC	HEDULE:	PART 3	STACK/VENT I		377				· ·	
Hrs. per day	Days per week	per	Months in Operation	Stack No:	Stack %xit Direction (horiz-vert)	Inside Di- ameter at top (ft)	Height above grount (ft)	Exit gas Temp. (OF)	Quantity gaseous discharge (acfn)	city	Does stack have rain cap?	
1. 8	3	52	12	10	Horiz.	6" sq.	10'	450°F	Unk		NA	• • .
2. 8	1	52	12	NA	Exhausts t	o Dust Collec	tors			·		
3. 8	5	52	12	n	11 11	11 11				•		
4. 8	3	52	12	11	11 11	51 11		,				•

PART 4. PROVIDE A ROOF PLAN SHOWING LOCATION OF STACK(s) AND VENT(s).

CERTIFICATION: I certify that I have examined the information on this page and that to the best of my knowledge, it is true and complete.

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DATE RECEIVED	APPLICATION NUMBER	COORDINATES		

 $\Delta P - 5$ LIQUID ORGANIC MATERIAL STORAGE

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LIQUID ORGANIC MATERIAL STORAGE (see instructions, page 2)

APPLICATION NUMBER

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PART 1. MATERIAL STORAGE	E DATA						
MATERIAL BEING STORED	Annual Thruput (gals)	TYPE OF STO CONTAINER drum, etc.	(tank,	Size of Container (gals)	Numbe Ident Conta		Location of Con- tainer (Inside or outside of bldg)
1. Resin 828	20,000	Tank	40	00	4		Inside
2.							
3.							
4. PART 2. STACK/VENT DATA							• •
(none, floating roof, with vent to atmosphere closed with vapor reconsystem, other (specify)	very items: Vent Exi	served by an anti- t Direction (tal-vertical)	Does vent have rain cap?	Height abov ground (ft)	e Quant	ity of us Bis-	EMISSION RATE
1. Yented	Horizo	ntal	NA	10	Unki	nown	Inknown
2.						****	
3.	1					········	<u> </u>
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CERTIFICATION: I certify it is true and complete.	y that I have ex	acined the info	ormation on	this page and	that to	the best	of my knowledge,
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AP-2 A. Process/Manufacturing Equipment

I. Process Fuel Furning Equipment

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•	DATE INSPECTED	INSPECTOR	DATE ACCEPTED	DATE REJECTED	ACKNOWLEDGED
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7

A. PROCESS/MANUFACTURING EQUIPMENT (see instructions, page 2 and 3)

APPLICATION NUMBER

PART 1.				Type	1	I	OCATI	ON	RAW	MATERIA	LS	•		FINISHED	MATERIALS	
Major	Step	s Involv	red	Equip	ment	OF F	QUIPM	ENT				Max/	Total/		Max/	Total
•	Froc			Used		Plant	Bldg	Floor	1	Type		Hour	Year	Type	Hour	Year
Dŕv	ing 1	Microba	1100	ng Ot	zen.	7	7	Basem		lass Balloon	a			Micro Balloons	60 lb	s 100 0
		ed Stoc	,	Spray		1	5	1	Sodi	um sil c acid	ica	te ter,	70.1 3	Fee	ed	hs 75.0
. Mfg	. Gla	ass Bal	loon	Ballo S furr	oning	7	5.	1&2 c		ed Stoc			/ ga	Micro Balloons	•	350,000
ART 2.		RATING S			ART 3.	STACK										<u> </u>
Hrs.	Days per	Wks.	Mon in	ths	Stack	Stack direct			lde di- er at	Heigh above		as emp.	Quantity Gaseous	Exit Velo-	Does Sta	-
day	week	yr.	Ope	ration	No.	(horiz	-vert) top	(ft)	groun (ft.)	d ((°F)	Discharge (acfm)	city (ft/sec)	cap?	
. 8	<u>. 3</u>	52	12		10	Horiz	<u> </u>	6"x	3"	10'	4	50°			NA	
. 8	1	52	12			SEE 1	PART	4 BELO	OW - I	TEM 2						يا
. 8	5&3	52	12			. 11	"	<u>, , ,,</u>		11						
ART 4.	PRO	CESS EMI	2210	MS		,			PART	5. EMI	SSIO	N CONT	ROL SYSTEM	, IF APPLIC		
Stac Numb	1	Туре		ontamin itted	ant (s)			unt tted /yr.	-	Type		Manufa	cturer	Percent Efficiency	Date of Installa	•
. 10		Flue G	as													
· NA		Partic	ulat	es (G1	ass)	less 0.11			Bagho	use(2)	To Do	orit I	on Co.	99.9%	1974	
· NA		1		!!			11		11	(3)	ļ.	· !!		99.9%	1975	
ERTIFI t is t	CATIO	N: I ce	rtif	y that SIGNE	I have	examine	d the	inform	ation	on this		e and (that to th	e best of my	y knowledge ATE:	3,

B. PROCESS FUEL BURNING EQUIPMENT (see instructions, page 5)

	PΛΙ	T 1. EQUI	PMEN	T DAT	A:														·	
		Type			LOCATI	ON	Size	of	Unit	BUR	NER .		FUEL	ATA	•					
	F	Equipment		OF	EQUIP	MENT	(Ind	icat	e Btu/	Type	e (s)		Тур	5	Ant	lyr.		Maxin	num	
		Used	·	lant	Bldg	Floor	hour	OI	hsp) .	(ro	t. cup,		Fue	1	(be	rrels	, gals		•	
										gun	, etc)				ton	s, cu	.ft.)	Fuel	Rate:	
	1	Drying Oven	_1_		1	Base- ment		000	BTU/HR	Atmo	spheri	c Torch	Natura	ıl Gas	1,3	0,00	00 cu	tt 7	/ /23 c	u.ft/
•	2.	Spray Dryer	1_		5	1			о вти/н		•	tī	71	11			cu.f]	190	cu ft
,		Ballooni Furnace	ng 1		5	1		•	BTU/HR	11	11		11	11	7,08	5,70	0 cu.	ft 1	770	cu.ft.
	E	Balloonin Turnace	3		5		310.	000	BTU/HR	11	11		f 11	11	1,40	0,00	0 cu.	ft. 1	180	cuft.

PART 2.	OPER			PART 3								
Hrs. per day	Days per week	per	Months in Operation	Stack No:	Stack Txit Direction (horiz-vert)	Inside Di- ameter at top (ft)	Height above grount (ft)	Exit gas Temp. (OF)	Quantity gaseous discharge (acfn)	city	Poes stack have rain cap?	
1. 8	3	52	12	10	Horiz.	6" sq.	10'	450°F	Unk		NA	
2.8	1	52	12	NA	Exhausts to	o Dust Collec	tors					·
3. 8	5	52	12	**	11 11	11 11				•		
<u>4. g</u>	_3	52	12	**	11 11	11 11					:	<u> </u>

PART 4. PROVIDE A ROOF PLAN SHOWING LOCATION OF STACK(s) AND VENT(s).

CERTIFICATION: I certify that I have examined the information on this page and that to the best of my knowledge, it is true and complete.

SIGNED	,•	TITLE	DATE	
	· · · · · · · · · · · · · · · · · · ·		DALL	
				 _

DATE RECEIVED APPLICATION COORDINATES NUMBER

APPLICATION FOR REGISTRATION OF AIR CONTAMINATION SOURCES INFORMATION REQUESTED FOR CALENDAR YEAR 1975

AP-2 A. Process/Manufacturing Equipment

E. Process Fuel Furning Equipment

DATE INSPECTED INSPECTOR DATE ACCEPTED DATE REJECTED ACKNOWLEDGED

7

A. PROCESS/MANUFACTURING EQUIPMENT (see instructions, page 2 and 3)

APPLICATION NUMBER

		1	Type	· Ţ		LOCATIO		RAW	MATEP.IALS			FINISHED	MATERIALS	· ·
Major	Steps	s Involv	ed Equip	ment		EQUIPME		_		Max/	1	1.	Max/	Total/
Iñ	Froce	ess	Used	,	Plant	Bldg I	loor		Гуре	Hour	Year	Type	Hour,	Year
l. Blen	ding		Mixer	*	1		1	1	ns,Solver Lvsts	t				
Blen		``	Mixer		1		2	Resi	ns, Solve Lysts	nt,				
Blen	ding		Mixer		_1		3	Resi Cata	ns, Solve Lysts	nts,				
ART 2.		RATING S		ART 3.		VENT I						,	, e ·	· · · ·
per	Days per	per	Months in	Stack	Stack	tion	anet	de di-	above	Gas Temp.	Quantity Gaseous	Exit Velo-	Does Stac	
day	week	yr.	Operation	No.	(hori:	z-vert)	Eop	(ft)	ground (ft.)	(°F)	Discharge (acfm)	city (ft/sec)	cap?	
. 8	5	52	12	4,5, 6,8	Horiz	Z	· N/A		15-20Ft	AMB	Unk	Unk	No (Shutt	ered f
2.											•			
3. 8	5	52		1 & 9	1- Ve 9- He		1		60 ft.	Amb.	Unk.	Unk	Vented E Shuttere	
ART 4.	PRO	CESS EMI	SSIONS					PART	5. EMISSI	ON CONT	TROL SYSTEM	, IF APPLIC		
Stack Numbe		Туре	of Contamin	ant (s)		Amou Emit Ton	ted		Type	Manufa	acturer	Percent Efficiency	Date · of Installa	•
L. 4.5	1		Vapors/		Unk		,,,,,,	None				Differency	·	
88_			Vapors/								·			<u> </u>
1.&.	e e	Hydrocs	lc Vapors/ rhons rtify that			nk		None			r			

DATE RECEIVED -	APPLICATION NUMBER	COORDINATES

AP-2 A. Process/Manufacturing Equipment

I. Process Fuel Furning Equipment

OFFICIAL USE ONLY

DATE INSPECTED | DATE REJECTED | ACKNOWLEDGED

7

A. PROCESS/MANUFACTURING EQUIPMENT (see instructions, page 2 and 3)

APPLICATION NUMBER

				Type			LOCATIO		RAW	MATERIALS			FINISHEI	MATERIALS	
Major	Step	s Invol	lved	Equip	pment		EQUIPME				Max/			Max/	Total/
Iñ	Froc	ess		Used		Plant	Bldg F	loor		Type	Hour	Year	Type	Hour,	Year
							1 1		Resi	ns,Solve	ent]			
. Blei	nding	<u> </u>		Mixer	r	1		1	Cata	lysts					<u> </u>
• Bler	nding	<u> </u>	`	Mixer		_1		2		ns, Solv	ent,				
· Bler	nding	[Mixer		<u> </u>		3	Resi Cata	ns, Solv lysts	ents,				
ART 2.	OPE	RATING			ART 3.		VENT D			,					
Hrs.	Days			ths		Stack			de di-	,	Gas	Quantity		Does Stac	
ber	per	per	in	_	Stack	direct			er at	above	Temp.	Gaseous	Velo-	have rain	
day	week	yr.	Ope	eration		(horia	z-vert)	top	(ft)	ground (ft.)	(°F)	Discharg (acfm)	e city (ft/sec)	cap?	
. 8	, 5	52	12	}	4,5, 6,8	Horiz	3	· N/A		15-20Ft	АМВ	Unk	Unk	No (Shutt	ered f
												·			
. 8	5	52		7 4 5 2	1 & 9	1- Ve 9- He		1		60 ft.	Amb.	Unk.	Unk	Vented E Shuttere	
ART 4.	PRO	CESS EN	ISSI	ONS					PART	5. EMISS	ION CON	TROL SYSTE	M, IF APPLIC	ABLE	
Stac Numb	k	Турс		Contamir	nant (s)		Amou Emit Ton/	ted		Type	Manuf	acturer	Percent Efficiency	Date of Installa	•
• 4,5		Organi Hydi		pors/	1.	Unk			Non						
·8_		Organ Hydro					·		·						· · ·
. 1 &	9	Hydro	arbo	apors/		Ur			None.						
				y that SIGNE		examine	ed the	inform	ation		age and	that to the		y knowledge	• • • • •

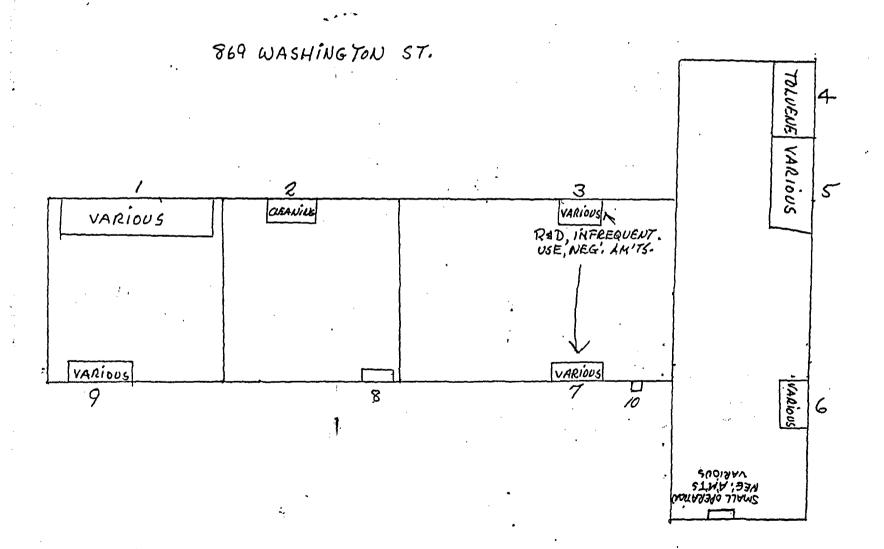
B. PROCESS FUEL BURNING EQUIPMENT (see instructions, page 5)

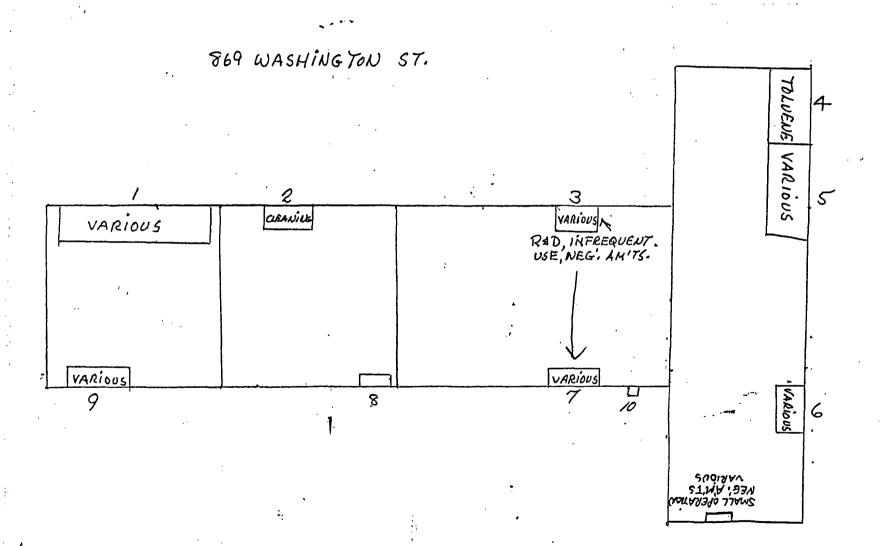
PART 1.			LOCATI		b	e of Unit	BURNER	FI	JEL DATA				
Equip Us	rent	Plant	Bldg			ndicate Btu/ or hsp)	Type (s) (rot. cup, gun, etc)		Type Fue1	Amt/yr. (barrels, tons, cu.f		Maximum Hourly Fuel Rate	المراع
1.					3								<i>.</i>
2.													
3.													,
4.													
PART 2. Hrs. per day	OPER/ Days per week	ATING SCI Wks per yr.	Month in Opera	ıs	PART 3. Stack No:	STACK/VENT I Stack Exit Direction (horiz-vert)	ATA: Inside Di- ameter at top (ft)	Height above grount (ft)	Exit gas Temp. (OF)	Quantity gaseous discharge (acfr)	Exit velo city (ft/ sec)	- stack	
1.													
	1 1	1		1				e-per					
2.							•						

PART 4. PROVIDE A ROOF PLAN SHOWING LOCATION OF STACK(s) AND VENT(s).

CERTIFICATION:	I certify	that I have	examined	the	information	on	this	page	and	that	to	the	best	of r	ñλ	knowledge
it is true and	complete.					•		, -							•	

	•				
SIGNED	 TITLE	, 	DATE	". 	•



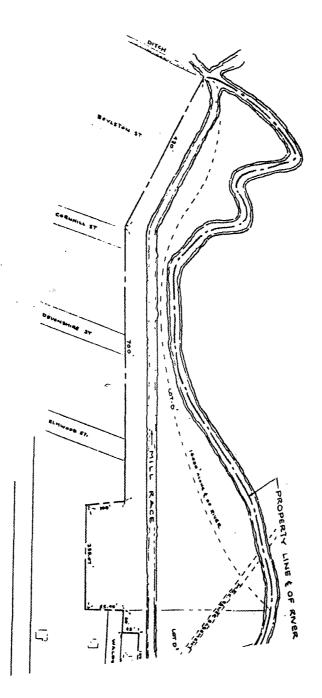


FACILITIES DATA

-		•		. "	LANI II			•		
		(1)	(2)·	(3)	(4)	(5)	(6)	(7)	(8)	(9)
PLANT II	<u>L</u>	PRODUCTS MANUFACTURED	INS. APPRAISAL(*) REPRODUCTION COST	SITE SIZE IN ACRES	PROPERTY PURCHASE DATE	BUILDING CONSTRUCTION DATE	TOTAL BLDG. FLOOR SPACE (SQ.FT.)	NUMBER OF STORIES	BLDG. GROUND FLOOR SPACE (SQ.FT.)	BLDG. SPACE UTILIZATION (SQ.FT.)
59 Walpo Canton,					•					
Building	1	None	\$204,800		1959	1924	8,000	2+ part basement	2,900 first floor	Storage - 2,200 Office - 5,800
Bui Iding	2	Kone	115,100		1959	1940	5,400	2+ basement	t,800	Storage - 1,800 Office - 3,600
But Iding	3	Eccoshield Flotation Eccomold Catalysts Resin Based	786,400		1959	1880-1920	55,400	2+ part basement	27,400 first floor	Mfg 30,400 Storage - 7,800 Lab - 1,200 Shipping - 4,700 Idle - 8,900 Not Usable - 2,0
Bui Iding	1 4	Flotation	327,400	•	1959	1820's	28,100) - 3+ basement	18,500	Mfg 12,700 Maint 5,800 Storage - 3,200 Not Usable - 6,
Bui Iding		Flotation Eccospheres	768,400		1959	1880-1920	48,000	3+ basement	12,000	Mfg 12,000 Storage - 13,000 Office - 4,000 Hot Usable - 7,0 Idle - 12,000
Bui Iding	6 .	None	214,600		1959	1880-1920	5,900	1	5 .9 00	Lab - 5,900
Yotal Pl	ent II	•	\$2,416,700	15.34	. K.A.	K.A.	150,800	K.A.		Mfg 55,100 Maint 5,800 Storage - 20,000 Office/Lab - 20,5 Shipping - 4,700 Not Usable - 15,8 Idle - 20,900

⁽⁴⁾ Appraisal by Marshall & Stevens Inc. in October, 1976 adjusted to reflect subsequent inflation.

Checked By: RSH Date: 10727777



4 3

Plant II in Canton is a multi-storied, irregular shaped, former mill facility located approximately two miles from the center of Canton, Massachusetts. This facility is the second one acquired by E&C, and the boundaries are shown on the plot plan. The rear portion of the site extends westward in an irregular manner for one-third mile, encompassing approximately ten acres of wetlands area which is unsuitable as a future building site. Also contained on this site is a small dam on the Neponset River, and running through the center of this site, beneath the buildings, is a river tributary which formally provided water power for the mill operations.

With the exception of a portion of building #1 (offices), the construction of the buildings on this site is of rubble stone basements and foundations with timber supporting columns, wood floors, and either wood or rubble stone interior walls. The structural condition and appearance of this facility ranges from unusable/substandard to adequate/average, with approximately 15% of the total building floor space being unsuitable for storage or manufacturing due to its poor structural condition. There is a need for upgrading the usable portion of this facility with an emphasis on electrical, appearance, and structural; and the RCA projections include incremental expenses averaging \$80,000 (pre-tax) per year to improve the condition of this plant. In addition, the RCA capital projections provide \$475,000 over the five year period for facilities improvements, including the installation of a wet automatic sprinkler system and a boiler replacement.

The following two pages present the facilities data and plot plan for Plant III in Gardena, California.

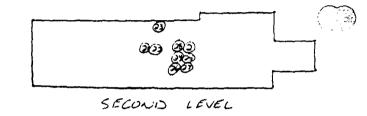
(See Table and Plot Plan on the Following Pages)

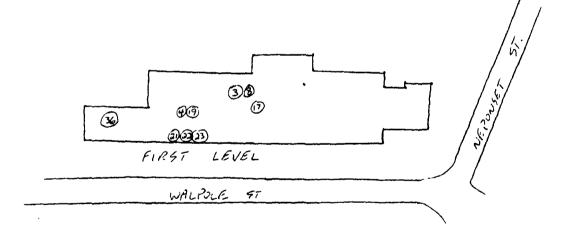
REGISTRATION FORM

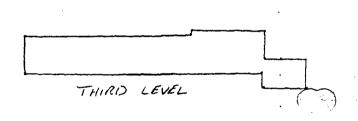
HAZARDOUS MATERIALS BYLAW

EMERSON & CUMING DEWEY & ALMY CHEMICAL DIVISION, W.R. GRACE & CO.

ADDRESS: 59 WALPOLE ST., CANTON, MASS. 02021
TEL. NO. 828-3300
TYPE OF BUSINESS: List principle products or services
WE MANUFACTURE: SYNTACTIC FOAM FLOTATION PRODUCTS
MICROWAVE ABSORBER PRODUCTS
SIC CODE, IF KNOWN 28 X 21
HAZARDOUS MATERIALS ON SITE (SUBMISSION of a map contining the following information is sufficient)
MATERIAL NAME *TYPE OF APPROX. HAZARDOUS SPECIAL LOCATION STORAGE QUANTITY PROPERTIES HANDLING
SEE ATTACHED MATERIAL LIST AND HAZARD CODE SHEET
*(Use codes: U=underground tank; AT=Aboveground Tank; AC=Aboveground containers or drums)
EMERGENCY EQUIPMENT (If map submitted, locate equipment on map) EQUIPMENT NAME and
LOCATION USE
THERE ARE NUMEROUS WATER, CARBON DIOXIDE AND DRY CHEMICAL FIRE EXTINGUISHERS LOCATED THROUGHOUT THE PLANT.
POSTING REQUIRED
Where is the above listing or map posted on site?
INSIDE
GUARD SHACK FIRE ALARM BOX BOX SPRINKLER RISER X OTHER LOCATION (SPECIFY)
Are all locations where hazardous materials are stored or used in quantities that could cause a hazard, posted with warning signs of bright yellow or other bright color, indicating the potential danger and how to overcome or avoid such danger? HAZARD CODE SHEETS ARE POSTED
MATERIALS SAFETY DATA SHEETS EMERGENCY CONTINGENCY PLAN
Where are the Materials Safety Data Sheets for all hazardous materials kept on file? TECHNICAL SUPERVISOR'S OFFICE







HAZARDOUS MATERIALS LISTING

Map Location	Material Name	Type of Storage	Approximate Quantity	Hazard Code
1	Araldite 6005 Liquid Epoxy	AC	55 gal	12S2
.2	Methylene Dianiline	AC	200 lbs	12S2V2X Suspected Carcinoge
3	DER542 Solid Epoxy	AC	40 lbs	DIII
4	Methylene Chloride	AC	220 gal	IIVI
5	DER324 Liquid Epoxy Resin	AT	4000 gal	12S2V2
6	Dodecenylsuccinic/Anhydride	AC	4000 gal	I2X For fire, use foam, CO2
7	Versamid 140 Resin Catalyst	AC	1650 gal	12
8	DMP-30 Resin Catalyst	AC	165 gal	12S2
9	Toluene	AC	55 gal	F3IlV1
10	Isopropyl Alcohol	AC	55 gal	F3IlV1
11	Epon 828 Epoxy Resin	AT	4000 gal	12S2V2 .
12	Tetraethylene Pentamine	AC	275 gal	1252
13	Tertbutylstyrene	AC	1100 gal	F2IIV1
14	Chemlink 30 Resin Catalyst	AC	55 gal	II .
15	Nuodex Cobalt Naphthanate	AC	55 gal	F2S1V1
16	Silane A-174	AC	55 gal	Fl
17	Benzoyl Peroxide Paste	AC	32 lbs	12V2
18	Lekutherm X-50 Liquid Epoxy Resin	AC AC	260 gal	Ils2
19	Hardener 906 Resin Catalyst	AC	110 lbs	F1C2V2S2
20	Vorite 63 Chemical Prepolymer	AC	55 gal	I3S3V3

Map Location	Material Name	Type of Storage	Approximate Quantity	Hazard Code
21	Boric Acid	AC	10,000 lbs	X Avoid Breathing Dust
22	Borax 10M	AC	10,000 lbs	IlX Can be absorbed thru to induce boron poison:
23	Pliobond 2014 Adhesive	AC	550 gal	F2I1V1
24	Neoprene Latex 400	AC	330 gal	12
25	Darvan Waq	AC	55 gal	I1V1
26	Antimony Trioxide	AC	500 lbs	D2I2
27	Tamol SN	AC	50 lbs	DIII
28	Sodium Hydroxide Flake	AC	100 lbs	C3
29	Eccocoat 1805A Epoxy Paint	AC	110 gal	F1IIV1
30	Eccocoat 1805B Epoxy Paint	AC	110 gal	F2I2V2
31	Fuel Oil	AT (encased in sand)	5000 gal	F2
32	Compressed Oxygen	AC	8 bottles	(-)
33	Compressed Acetylene	AC	8 bottles	
34	Compressed Argon	AC	1 bottle	•
35	Compressed Nitrogen	AC	2 bottles	·
36	Compressed Propane	AC	8 bottles	
37	Compressed Propane	AT	1 small tar	k

HAZARD CODES

- 1 Mild Hazard
- 2 Moderate Hazard
- 3 Severe Hazard
- **V** Vapors can be respiratory irritants or otherwise toxic.
- **D** Dust can be a respiratory irritant or otherwise toxic.
- F1 Flash point greater than 200°F (ignitable liquid).
- **F2** Flash point 100°F-200°F (combustible liquid).
- F3 Flash point less than 100°F (flammable liquid).
 - I Skin and eye irritant.
 - **C** Corrosive.
 - **E** Explosive.
 - **S** Sensitizer.
 - X Special Hazard.See formula for instructions.

Where is the Emergency Contingency Plan kept on file? (Refer to attachment "A" - Designing a Contingency Plan). PLANT MANAGER'S OFFICE

EMPLOYEE TRAINING

Have all employees been	trained to ensure progress	roper handling of	all
hazardous materials?			
If so, list instructors'	name and describe	the training progr	cam:
EACH DEPARTMENT SUPERVISOR H			
HAZARD CODES. THEY WILL ALS	O SPECIFICALLY COVER ALL	L CHEMICALS IN THEIR	INDIVIDUAL
If not, when will traini	ng be completed?	DEPARTMENTS.	

HAZARDOUS MATERIALS STORAGE

List all underground tanks, age, size, type, and materials stored within. Give the date on which each tank was last tested and the test schedule now being followed.

NO UNDERGROUND TANKS ON SITE.

Are all	incompatible chemicals stored in separate	areas? YES
If not,	when will compliance be met?	(Deadline
July 1,	1984).	-

Are all aboveground containers used to store hazardous materials enclosed by a dike of impermeable construction with the capability of holding a spill equal to or greater than the volume of materials stored within? _____ YES

If not, list the locations where renovations must be made specifying the materials stored and the date renovations will be completed. (Deadline July 1, 1984.)

CONTINGENCY PLAN

617-478-4093

EMERGENCY COORDINATORS:

GIORGIO GIRARDI Technical Supervisor 86 East Main St Milford, Mass 01757 JAY McNEFF Plant Engineer 3 Highland St Foxboro, Mass 02035 (moving 10/3/83)

All chemical spills from storage or use areas do not constitute an immediate hazard or emergency because the environment (ground, water) has been projected against contamination from spills. Our only real emergency situation would come about in the event of fire. Most of our liquid chemicals will burn and emit toxic fumes, however most of these chemicals will not sustain combustion unless they reach their elevated flash points.

If a fire does arise, the plant's alarm system can be set off in two different ways. First, if and when the sprinkler system goes off, a flow switch in the sprinkler riser automatically sets off a coded alarm throughout the plant and at the fire station. Manual pull stations can also be tripped to turn in a fire alarm. The alarm code tells one the approximate location of the fire within the plant. An annunciator located next to the firebox at the front of the plant will visually display where an alarm has been tripped in the plant. Once a fire location is known, our plant map of hazardous materials can be checked to see if any chemicals may be in the fire area. Hazard Codes and Material Safety Data Sheets can be referred to for specific information, but in general, most of the liquid chemicals have flash points above 200°F. For large fires in which the drums may be heated to their flash points, cooling the drums with a fire hose is normally a good course of action. Obviously, once liquid has leaked and may spread, water will only spread burning liquid further.

As stated earlier, all personnel have been instructed to evacuate the building when the fire alarm is triggered. The alarm codes allow personnel to know where the fire is located so they will not exit in that direction. All areas have two or more exits with which to escape. Individual departments have their local exit routes posted as well as all points which exit from the entire building.

HAZARDOUS WASTE DISPOSAL

Describe the method of disposing of all hazardous waste.

HAZARDOUS WASTE IS STORED IN 55 GALLON DRUMS IN AN OUTDOOR DIKED STORAGE AREA. WHEN WE ACCUMULATE ENOUGH DRUMS FOR A SHIPMENT, CHEMICAL WASTE MANAGEMENT OF NATICK, MASS. IS CALLED TO PROPERLY SHIP OUT THE WASTE. THEIR E.P.A. I.D. NUMBER IS MAD980523203.

JOHN T. MCNEFF, II.

Name of Person Submitting the Form

SIGNATURE

....

Return To: Canton Board of Health 1492 Washington Street

Canton, Ma. 02021

Enclose \$15.00 FEE

Emerson & Cuming Unit Dewey & Almy Chemical Div. W. R. Grace & Co. 59 Walpole Street Canton, Mass. 02021

March 29, 1984

Jacob Edwards
—State Waste Programs
U.S. EPA, Room 1903
JFK Federal Building
Boston, Mass. 02203

Mr Edwards:

Emerson & Cuming formally requests to change our status of Hazardous Waste Storage Facility to Hazardous Waste Generator. Our EPA I.D. Number is MAD 000 361 709. When our Company originally filed its application in November, 1980, the following three process codes were used:

SO2 - Tank Storage 600 gallons

TO3 - Treatment by incineration 20 gallons per hour

SO1 - Drum Storage 1000 gallons

The person who filled out this application is no longer with the Company and was apparently in error when describing our hazardous waste process. We have never incinerated a hazardous waste to the best of my knowledge and have never stored a hazardous waste in a tank. We only accumulate our waste in 55 gallon drums and periodically ship it out to a licensed hazardous waste facility. Our only change is that we will ship all accumulated waste within 90 days.

Thus, Emerson & Cuming, 59 Walpole Street, Canton, Mass., EPA
I.D. Number MAD 000 361 709, formally requests to change from
Storage Facility status to Generator status.

Label M. Ola-

Randolph M. Olson Plant Manager

APR 11 1984

CERTIFICATION

ī,	RANDOLPH M. OLSON	, PLANT MANAGE	R , hereby
·	name) EMERSON & CUMING UNIT, CHEMICAL DIV., W. R. G		000 361 709 , which
	(name of company)	(EP	A I.D. #)
notified the	u.S. Environmental Protectio	n Agency ("EPA") tha	t it treats, stores and/or
disposes of	hazardous waste, at all times	from this date forwa	rd (1) will not accumulate
any hazardou	us waste for more than 90 days	; (2) will accumulat	e hazardous waste in
compliance v	with 310 CMR 30.340; (3) will	not store, treat, or	dispose of hazardous
waste; and	(4) will comply with all other	applicable requirem	ents of 310 CMR 30.000.
I under	rstand that the Department of	Environmental Qualit	y Engineering is deferring
	ty of the financial responsibi	EWEY & ALMY	
-	CHEMICAL DIV., W. R. GRA	CE & CU.	naving submitted
,	(name of company)		
emerŝon & (or change of status and this c CUMING UNIT, DEWEY & ALMY IV., W. R. GRACE & CO.		·
(name of co	ompany)		
I cert	ify under penalty of law that	I have personally ex	amined and am familiar
with the int	formation submitted in this do	cument and all attac	hments and that, based

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.

(Signature)

59 WALPOLE ST. CANTON, MASS. 02021

RANDOLPH M. OLSON

FEB. 10, 1984

(Name typewritten)





Emerson & Cuming

Dewey and Almy Chemical Division W. R. Grace & Co. Canton, Mass. 02021

1617) 828-3300

March 1, 1984

Nanci Siciliano
U. S. Environmental Protection Agency
Region 1
Water Quality Branch
J. F. Kennedy Federal Building
Boston, Mass. 02203

Dear Nanci:

This letter is to confirm our telephone conversation on Thursday, 3/1/84, concerning our facility's status of filing for an N.P.D.E.S. Permit. As I explained, our facility is built on top of an old mill raceway which drains into the Neponset River. Currently, sump pumps and trenches carry basement ground water seepage and non-contact air conditioner cooling water to openings to the raceway. We have authorizaed funding and are presently working to seal all drains and trenches to the raceway. All ground water and non-contact cooling water is being piped to a central surge tank which will in turn flow into a pool beneath the basement floor which drains to the old mill raceway. We hope to complete this work by the end of March to mid-April. At this point, we will send in our NPDES Permit Application.

This is the last of a series of environmental projects which were defined about one year ago in conjunction with the Town of Canton Health Department, Massachusetts DEQE and independant consultant Camp, Dresser and McKee. Although we have yet to receive a response from Mass. DEQE from Camp, Dresser and McKee's initial report and recommendations; we have proceeded to implement many of the recommended changes while keeping Canton Health Agent, Regina McCarthy, well informed of progress to date.

We are also having a comprehensive site plan of our facility including topographical information being drawn and expect completion around mid to late March. This will give us a much more accurate drawing of our facility and grounds than we currently possess. In addition, the entrance to the raceway which comes off the Old Mill Pond will be permantly sealed off with concrete by this time.

Currently, the entrance is covered by a metal plate. With all old floor drains being sealed by the end of March, water flow into the underground raceway will be much more easily defined and controlled.

At this point, the raceway can <u>only</u> collect water from the following sources:

- Ground water seepage into basement which
 will be sump pumped to central surge tank.
- Non-contact air conditioner cooling water.
- Three outdoor storm drains, one of which belongs to the Town of Canton.
- Seepage directly into raceway from groundwater.

We feel extremely confident that all of our discharges will be clean water with no pollutants. Our surge tank will give us a good sampling point to confirm this.

I will be in contact concerning final details as we prepare our permit application in early April. We feel good about getting this situation resolved and thank you for your assistance both now and in the near future.

If I can be of any assistance in the meantime, please do not hesitate to contact me at (617) 828-3300.

Sincerely,
Emerson & Cuming
59 Walpole Street
Canton, Mass. 192021

YayVMcNeff Plant-Engineer

cc: Edward K. McSweeney, Chief EPA Water Quality Branch

> Regina McCarthy, Health Agent Town of Canton

GRACE MEMO

to:

Vance Bakeman

from:

Jay McNeff

subject:

Monthly Environmental Report

5-le. 3480

data

April 16, 1984

cc:

R. Winterson

R. Marshall

R. Olson

A. Teague

R. Catardi

D. Sadowski

No situation creating an adverse impact on public health or the environment existed at Emerson & Cuming during the month of March, 1984.

Plant I (Canton, Mass.) is continuing to work with the Sewer Department on control of the PH of their microballoon wash water.

Plant II (Canton, Mass.) is on the verge of completing a project to seal off all old floor drains which flow to the underground mill race which in turn empties directly into the Neponset River. All clean water (basement seepage and AC non-contact cooling water) has been routed to one controlled outfall. NPDES permit application will be submitted in April.

JM/dlg



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Springfield, Mass. 01109 (413) 734-6548

Auburn, Mass. 01501 (617) 832-5500

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ALL ORDERS ARE ACCEPTED SUBJECT TO THE FOLLOWING CONDITIONS:

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East Netick Industrial Park 6 Huron Drive: Netick, MA 01760 (617) 235-7330, 653-5950 Telex 948459 GREENELAB NTIK Nondestructive • Chemical • Pollution • Metallurgical Inspection • Evaluation • Analysis
Research • Development



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Auburn; Mass. 01501 (617) 832-5500

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11/2% SERVICE CHARGE PER MONTH ON ALL ACCOUNTS OVER 80 DAYS PAST DUE (ANNUAL RATE 18%)
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Our responsibility for the spollage of work done by us shall in no event exceed the cost charged by us for the services requested regardless of whether said damage is directly attributable to our services of the articles above enumerated or otherwise. No further warranty, express or implied, or obligations of any, kind, contractual or otherwise will be assumed by us aither to the original customer or any other person, unless the same has been reduced to writing and signed by both us and you, in which event a higher charge will be made for our servic prices for which will be gladly quoted to your upon request. No agent or representative is authorized to assume as any lability except as set forth above.

PACKING LIST

GRACE MEMO

Distribution

dore: December 4, 1984

from:

R. M. Olson

subject:

TRASH HANDLING PROCEDURES

The intent of this memo is to square away and standardize the methods by which we process trash, rubbish and scrap for salvage.

A. Absorber Production

- 1. Normal absorber trash is collected by absorber production in the portable carts (only) and fed to the baler for baling on a daily basis. Upon discharge of the bales onto pallets in front of the baler; Shipping/Receiving will move the bales as necessary into the BFI dumpster.
- 2. Clean scrap foam (white) will be collected as it's generated by the profile saw and baled by absorber production. Upon discharge of the clean scrap foam bales from the baler onto pallets, Shipping/Receiving will move the bales to the pallet storage racks in the S/R area. The bales will accumulate here until the next Clark Foam delivery. The bales will be weighed and loaded onto the Clark Foam truck with the appropriate pick-up paperwork.
- 3. Door fab trash and other absorber non-balable waste (that is not hazardous or chemical waste) shall be collected separately. This material shall be taken by absorber production downstairs and put into one of the flotation tilt dumpsters.

B. Print Shop/Mail Room

- All paper, cardboard and dry trash from the Print Shop/Mail Room is accumulated outside the mail room (in the basement across from the elevator) in the designated cart. Absorber production will pick up weekly or as required and fed to the baler. This trash will be baled with the absorber trash and handled accordingly.
- Wet print shop trash shall be handled separately from the paper.
 This should be handled on a case by case basis.

C. Offices

 Office trash collected by PSC cleaning is accumulated in the designated cart next to the old S/R area. Absorber production will pick-up this cart daily and process with the absorber and/ or print shop/mail room trash.

F. Flotation Production - continued

The empty carts are then returned to the staging area just outside the flotation garage doors.

Note: Upon flotation production clearing up the backlog of solid epoxy waste drums inside and outside the flotation area; the cured epoxy waste slugs using drum liner bags shall be put into the trash carts by flotation production the same as any other flotation trash.

G. Maintenance

Maintenance generated trash in the shop(s) and at a job site should be arranged on a case by case basis between Maintenance and Shipping/Receiving.

Other General Disposal Notes

- 1. Shipping/Receiving shall keep a daily eye on the BFI dumpster to make arrangements for BFI pickup. We need to have the dumpster full to the top for each pickup to keep costs down but conversely trash ready to go into the dumpster cannot accumulate outside waiting for room in the dumpster.
- 2. Empty wooden pallets from production (absorber, flotation and print shop) shall be neatly stacked at your designated area(mezzanine, outside the door(s)) for pickup by Shipping/Receiving. S/R will then move the pallets to the pallet storage area at the back of the yard for accumulation, reuse or disposal.
- 3. Empty steel drums are to be drained, sealed with the bung cap and stacked upside down on suitable pallets in groups of (4). Pallets of empty drums shall be staged at the mezzanine or just outside the door(s) for pickup by Shipping/Receiving. S/R will then move the pallets of empty drums to the drum storage area for accumulation. When a truckload (approx. 200 drums) are accumulated; Shipping/Receiving shall call in the reconditioner for pickup.
- 4. Chemical/Hazardous Waste will continue to be handled by the current existing procedures (labelling, dates, drums, closure, identification paperwork, handling, etc). These drums are forwarded/picked-up by Shipping/Receiving to be prepared for Chemical Waste Management shipment.

If there are any glinches, problems, questions or revisions related to these procedures let me know.

R. M. Olson

C. Offices - continued

2. Occasionally, there will be boxes of long term storage records to be disposed of by accounting, These boxes will be picked up outside the front office basement retention area by absorber production and baled with other absorber trash.

D. Nose Cap Production

All Nose Cap trash will be collected in the department in the designated plastic push cart. Weekly or as it becomes full, Nose Cap production will move the cart down to the baler. Absorber production will bale this in with their trash.

E. Shipping/Receiving

General S/R trash is collected in the designated barrel next to the S/R bench. Weekly or as required this barrel will be forwarded to absorber production for baling with absorber trash.

F. Flotation Production

- 1. Dry EP trash (i.e. empty FIGLAS bags) is collected in the designated cart. As this cart is filled or periodically during the week it shall be forwarded directly to absorber production for baling with absorber trash.
- All cardboard is to be kept clean and shall be broken down and stacked into the designated wire frame pallets. As these wire pallets are filled (one by one), flotation production will move the pallets just outside the flotation door to the designated area. At this point Shipping/Receiving shall pick up these cardboard pallets daily and forward to the baler. The space next to the baler shall be kept clear of other materials and used for accumulating pallets of cardboard. As the cardboard accumulates, it will be baled by absorber production. Upon the cardboard bales being discharged onto pallets, Shipping/ Receiving will move the bales to the storage racks in the S/R area (by the clean scrap foam bales). The cardboard bales will be accumulated for pick-up by the scrap dealer and processed with the appropriate paperwork (similar to clean scrap foam sales). The empty wire pallets generated by absorber production during cardboard baling will be broken down, filled and stacked. Shipping/ Receiving will then return the "empties" to flotation production on a regular basis.
- 3. General flotation production trash (mold prep. block, EP, mold prep, finishing, etc) is to be accumulated in the appropriate areas tilt dumpster cart. Drums, pails, and boxes are not be used for trash. These carts will be moved out the door to the designated staging area daily. This should occur at standard times such as 7:30-8:30AM during S/R material delivery to flotation and 3:00-3:15PM during shift clean-up. Shipping/Receiving will then pickup the dumpster carts and dump to the BFI dumpster.



AUG 2 5 1982

Emerson & Cuming

Carten-Pillition

Dewey and Almy Chemical Division W. R. Grace & Co. Canton, Mass. 02021

(617) 828-3300

August 23, 1982

Mr. Steven Lipman
Deputy Regional Environmental Engineer
Department of Environmental Quality Engineering
323 New Boston Street
Woburn, MA 01801

Dear Mr. Lipman:

This correspondence is in response to a request by Ted Kaegal (DEQE) for some additional information regarding Emerson & Cuming's plant on Walpole Street in Canton. This information is to follow-up the visit of Ted on Wednesday, July, 21. This information includes the following as requested:

- a. Listing of wastes stored outdoors at the plant site (see Attachment A)
- b. Listing of chemicals stored in the proximity of floor drains (see Attachment B)
- c. Approximate location of all floor drains (See attached digram).
- d. Corrective action plan.

We would like to emphasize that because the Walpole Street plant utilizes "dry" and "self contained" processes there has never been any industrial waste discharged from the facility into either the underground raceway or the Metropolitan District Commission Sewer. All sanity wastes are discharged to the MDC sewer.

We are currently engaged in several corrective activities.

1. Removal of Waste Material. Work is progressing in the removal of the drummed waste stored outdoors. Identification of material is nearly complete. Fourty drums of waste were removed by Chemical Waste Management of Natick on July 26, 1982, and fourty drums on August 19, 1982 by same.

Several more shipments are anticipated by the end of this month. Any drums not yet shipped have been moved to the diked concrete pad storage area.

In June 1982, \$26,000. was allocated for this waste removal.

2. Diking of Resin Tank Storage Area. We are in the process of installing a diked concrete pad for the bulk resin storage tanks. This project is expected to be completed within eight weeks. As part of this project, the bulk storage tanks will be repiped in order to substantially reduce the amount of drummed raw material which must be stored onsite. In addition, the catch basin near the storage area has been sealed in order to prevent any potential spillage from reaching the underground raceway.

Emerson & Cuming has already approved \$89,000 to complete this task.

3. Internal Drainage. The existing floor drainage system was built by earlier operators of the plant during the time of its use as a textile mill. Three of the existing drains (1,12, and 13 on the attached diagram) are still important to the functioning of the plant. Point number 1 is a ground water sump underneath the elevator shaft. Operation of the sump is essential to prevent flooding of the ground floor of the plant. Point number 12 collect ground water seeping in through the wall of the plant facing Walpole Street. Point number 13 collects ground water seeping in through the wall of the plant facing Neponset Street.

We are currently studying the options for sealing floor drains while at the same time ensuring that groundwater flooding problems will not be created as a result.

We would like to invite Gina McCarthy of the Canton Board of Health and yourself for a return visit to our plant later this month. Please contact us at any time if you have further questions. We intend to cooperate fully with both Gina and DEQE in resolving this matter as soon as possible.

Randolph M. Olbor

Randolph M. Olson

Plant Manager Emerson & Cuming 59 Walpole Street Canton, MA 02021

bee: Mark Holer

Attachment A

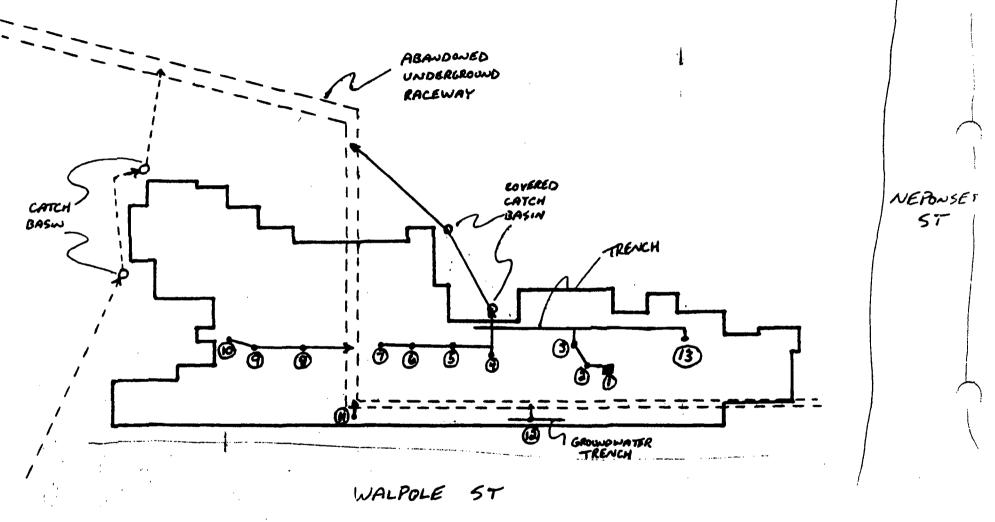
Wastes Identified in Rear Area of Plant

Solid epoxy resin powder Alcoa aluminum powder 101 Pliobond contact adhesive, methylene chloride Pyromellitic Dianhydride Epoxy resin 828 (liquid), glass microballoon, methylene chloride Epoxy latex paint Cured tertbutylstyrene Alkyl Glycidyl ether (Epoxide 8) Powdered phenolic resin Red Iron oxide powder (foxide) Cured epoxy resin, microballoons Polyester resin Tertbutylstyrene resin Dodecenylsuccinic Anhydride (DDSA) Isopropyl Alcohol

Attachment B

Chemicals Stored in Areas of Plant with Floor Drains

Epoxy resin 828 Milled Fiberglass Tetraethylene Pentamine Polystyrene beads Glass beads (1/2" diam.) Glass microballoons Methylene Chloride Aklyl Glycidyl Ether Trimethylol Propane Trimethacrylate Gamma Methacryloxypropyltrimethoxysilane (A174) Tert Butylstyrene Epoxy Latex paint Cured Resin Dust Polyamide resin Methyl Ethyl Ketone Peroxide 55% Benzoyl Peroxide Cobalt Napthanate solution Di-2 Ethyl Hexyl Phthalate (DEHP)(DOP)



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II. POLLUTANT CHARACTERISTICS					
INSTRUCTIONS: Complete A through J to determine a questions; you must submit this form and the supplemental form is attached. If you answer "no is excluded from permit requirements; see Section C of the SPECIFIC QUESTIONS	ntel form listed in the to each question, you instructions. See also MARK X	perenthesis following the qui ou need not submit any of the o, Section D of the instruction	estion. Mark "X" in the box in t se forms. You may answer "no	the third o " if your a terms.	olumn
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C. la bis a facility which currently results in discharges to histors of the U.S. other than those described in A'or Babove? (FORM 2C)			y (other than those described will result in a discharge to IM 2D)	X	17
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G. Do you or will you inject at this facility any produced weter or other fluids which are brought to the surfact in ennection with conventional oil or natural gas production, inject fluids used for enhanced recovery of it or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	X	H. Do you or will you injected processes such as in processe, solution mining	et at this facility fluids for spe- nining of sulfur by the Frasch g of minerals, in situ combus- covery of geothermal energy?	31 32 X	
L. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an	X X	NOT one of the 28 ind instructions and which to per year of any air pollu	ed stationary source which is lustrial categories listed in the will potentially emit 250 tons tent regulated under the Clean or be located in an attainment	х	
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VIII. OPERATOR INFORMATION	
A. NAME	B. is the name listed if
SEMERSON& CUMING, W. R. GRACE	owner?
SEMERSON & CUMING, W. R. GRACE	X YES NO
C. STATUS OF OPERATOR (Enter the appropriate letter into the answe	
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E STATE 0 = OTHER (specify)	10 10 - 10 10 - 11 21 - 21
R. STREET OR P.O. BOX	
59 WALPOLE STREET	
P. CITY OR TOWN	G.STATE M. ZIP CODE IX. INDIAN LAND
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ACCEPTIFICATION (see Instructions)	
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information, including the possibility of fine and imprisonment	reproces a min member of the surface of the supplication of the su
A. NAME & OFFICIAL TITLE (type or print) B. SIGNA	
RANDOLPH M. OLSON, PLANT MANAGER	MAY 8, 1984 -
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MENTS FOR OFFICIAL USE ONLY	
PA Form 3510-1 (6-80) REVERSE	

APPLICATION FOR PERMIT TO DISCHAR

EWALER EXISTING MANUFACTURING, COMMERCIAL, MINING AND STLVICULTURAL OPERATIONS

of the second

Consolidated Permits Program

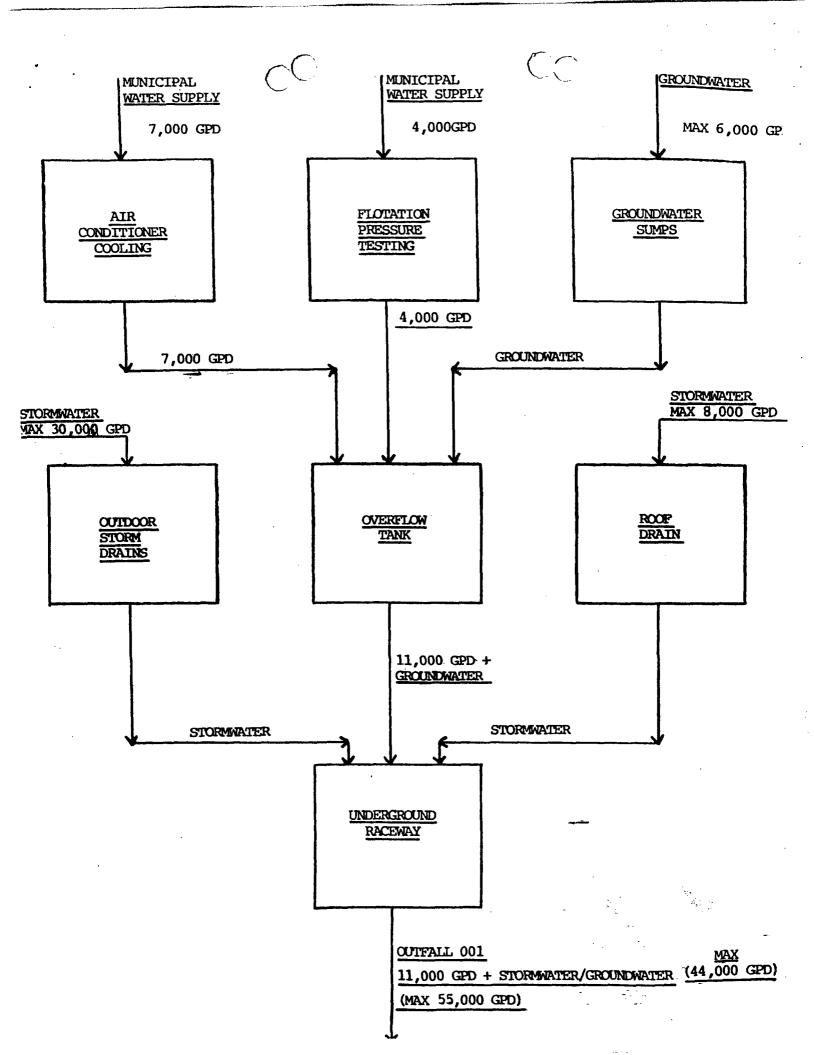
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II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

- A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effice it. and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. It a water balance cannot be determined le.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.
- B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent_including process wastewater, sanitary wastewater.

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001.	A.C. NON CONTACT COOLING									
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. Are you now re water treatment but is not limit or loan condition	quired by any (equipment or) ed to, permit co	practices o inditions, a	ate or lo ir any ot idministra	her environi ative or ento	nental progra orcement orde	ens which may ers, enforcemen	affect the d	or the constru scharges desc schedule lette	iction, ungrade	optication? Th	on of w
					following la	ble,	VINO (16)	o Item IV-B)		4. FIR	AL CO
DENTIFICATION AGREEME		8. No.		ED OUTFA		3. BR	IEF DESCR	TION OF PR	0/ECT	PLIAN	CEDA
	•				;						
								•		A.S.	
					i				-		
			! !							:	ţ



ONTINUED FROM PAGE 2 . INTAKE AND EFFLUENT CHA	MAD 01 709		1 Approved 3 No. 2000-0059 3 roval expires 3-31-84
A R & C: See instructions before		bles for each outfall — Annotate the o	utfall number in the spece provided.
D. I below to list as	of the pollutants listed in Table 20	-3 of the instructions, which you know	w or have reason to believe is discharged or may be present and report any analytical data in you
1. POLLUTANT	2. SQURCE	1. POLLUTANT	2. SOURCE
NO POLLUTANTS		·	
į.			
•		[
	OZ COVERED BY ANALYSES		
22V METHYLENE CHLO	RIDE		
25V TOLUENE	Artes (A. 47)	,	
27V 1,1,1 TRICHLORG	ETHANE		
9M NICKEL			
11M SILVER 29B Di-N-OCTYL PHI	ואר אוווגי		
	your me metarists, processes, or pro- ima me majorium velues reported in Type (complete Hem VI-C below)	INNA V.C.	ry so that your discharges of pollutants may during
C. If you aremered "Yes" to Its	m VI-B, explain below and describe in		of such pollutants which you anticipate will be
The second of th	DAME THE USE IN A COURT OF THE DEST OF AC	or somey at this time. Continue on so	MILLORIA SHEETS IT YOU HEED MOTE SPECE.

BIOLOGICAL TOXICITY TESTING DATA Do you have any knowledge or reason to beheve it.	y prological test for acute or chronic too	cicity has been made on any o	t your discharges or on a
ceiving water in relation to your discharge within th		V	
TARS (mentily the textis) an	d describe their purposes below)	X NO (HO to Sec	tion VIII)
· ,		<u></u> ·	
	•	,	
•			
	•		
CONTRACT ANALYSIS INFORMATION ere any of the analyses reported in Item V perform	ed by a contract (aboratory or consulting	lirm?	,
	• • • • • • • • • • • • • • • • • • • •		tion III)
analyzed by, each suc	a, and telephone number of, and pollutants h laboratory or firm below)		
	S. ADDRESS	C. TELEPHONE	D. FOLLUYANTE ANALY
	8. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUTARTS ANALY (list)
	8. ADDRESS	c. TELEPHONE (area code & no.)	D. FOLLUYANTE ANALY (list)
·	S. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUTANTE ANALY
	S. AODRESS	c. TELEPHONE (area code & no.)	D. FOLLUYANTE ANALY (list)
	S. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUYANTE ANALY
	8. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUYANTE ANALY
	8. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUTANTE ANALY
	S. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUYARTE ANALY
	S. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUTARTE ANALY (list)
	S. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUYARTE ANALY
	S. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUYANTE ANALY
	S. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUYARTE ANALY (list)
	S. AODRESS	C. TELEPHONE (area code & no.)	D. FOLLUYANTE ANALY
ERTIFICATION	S. AODRESS	C.TELEPHONE (area code & no.)	D. FOLLUTARTE ANALY (list)
ertify under penalty of law that I have pers schments and that, based on my inquiry of mation is true, accurate and complete. I a	sonally examined and am familiar win those individuals immediately respon	th the information submit	ted in this application and
ertify under penalty of law that I have persochments and that, based on my inquiry of mation is true, accurate and complete. I assibility of fine and imprisonment.	sonally examined and am familiar win those individuals immediately respon	th the information submit sible for obtaining the info enalties for submitting fai	ted in this application and ormation, I believe that the lise information, including
ertify under penalty of law that I have persecting and that, based on my inquiry of mation is true, accurate and complete. I assibility of fine and imprisonment.	sonally examined and am familiar win those individuals immediately respon am aware that there are significant p	th the information submit sible for obtaining the info enalties for submitting fal	ted in this application and ormation, I believe that the ise information, including to (area code & no.)
ertify under penalty of law that I have persochments and that, based on my inquiry of mation is true, accurate and complete. I assibility of fine and imprisonment.	sonally examined and am familiar win those individuals immediately respon am aware that there are significant p	th the information submit sible for obtaining the info enalties for submitting fal	(Net) Ted in this application and ormation, I believe that the lise information, including
certify under penalty of law that I have persecting under penalty of law that I have persection is true, accurate and complete. I assibility of fine and imprisonment. A. NAME & OFFICIAL TITLE (type or print) RANDOLPH M. OLSON / PLANT MA	sonally examined and am familiar win those individuals immediately respon am aware that there are significant p	th the information submit sible for obtaining the info enalties for submitting fal	rted in this application and ormation, I believe that the lise information, including 0. (area code & no.)

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets (use the same format) instead of completing these pages.

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\$ 3-31-84 OUTFALL NO

V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 3-C)

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										tama dan melalisian	ul dataile	
PART A - You n	nust provide th	e results of at l	east one analys	is for every poll	utant in this tab	de. Complete	one table for	each outfall.	See instruct	ions for addition	ar details.	
	[. EFFLUENT		State of Co.		3. UN	!ITS	4. IN	TAKE (option	101)
:, POLLUTANT	a. MAXIMUM	DAILY VALUE	D. MAXIMUM	O DAY VALUE	CLONG TERM	AVRG. VALUE	d. NO. OF	(upecify i)	1	D LONG		B. NO. OF
	(1)	(2) MASS	CONCENTRATION		CONCENTRATION	(2) MASS	ANALYSES	TRATION	b. MASS	CONTENTRATION	(z) MASS	
a. Biochemical Oxygen Demend (BOD)	IAW	VER REQUE	STED									
b. Chemical Oxygen Demand (COD)	WAI	VER REQUE	STED									
c. Total Organic Carbon (TOC)	WAI	VER REQUE	STED									
d. Total Suspended Solids (TSS)	WAI	VER REQUE	STED									
e, Ammonia (as N)	WAI	VER REQUE	STED									
f. Flow	55,000	GPD	VALUE		VALUE					VALUE		
g. Temperature (winter)	VALUE 5°C		VALUE		VALUE			°C	:	VALUE		
h. Temperature (summer)	20°C		VALUE		VALUE			°C		VALUE		
i. pH	6.8	7.1	MINIMUM	MUMIXAM		<<		STANDAR	מדומט ס		><	
2124	45.456		·····				1 445 444 4		- 11 •	haller a	- les cheant	If you might

PART B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2-a for any pollutant, you must provide the results of at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements.

I. POLLUT-	2. MA	RK 'X'			3.	EFFLUENT				4. UI	NITS		TAKE (optional)	
ANT AND CAS NO.	à. BE- LIEVEC PRE- SLNT	b. se-	a. MAXIMUM I	DAILY VALUE	b. MAXIMUM 3	BOAY VALUE	C.LONG TERM	AVRG. VALUE	d NO. OF	a. CONCEN	h, MASS	AVERAG	E VALUE	L> SF
(if available)	SINT	SENT	CONCENTRATION	(2) MASS	CONCENTRATION	fel wass	CONCENTRATION	(2) MASS	YSES	TRATION	13. 111 2 3	COURSE NO SATION	(/) MAS'	():
a. Bromide (24959-67-9)		x	ľ							l				
b. Chlorine, Total Residual		x												
c. Color		x				,								
d, Fecal Caliform		X.	į.											
e. Fluoride (1 6984-4 8-8)		x							<u>.</u>					
f. Nitrate— Nitrite (as N)	,	х												

SEE INSTRUCTIONS.

		RK 'X'	M FRONT		200	ERPLIPATA	1 (A. A.) (A.			4. U	NITS		AKE (optional	1
					The Ask William S	C PAY WALUE		AVEC WALUE	4 NO OF			& LONG	E VALUE	b. NO. OI
ANT AND CAS NO. (if swellable)	ieve	IÈVED	a MUMIKAM A	SAILY VALUE	il ave	(lob(e)		(2) MASS	ANAL.	B, CONCENTRATION	b, MASS	CONCENTRATION	(z) MASS	ANAL.
t Nitrogen, l'atal Organic (as N)	32.71	Х	(I) CONCENTRATION	(2) MASS	CONCENTRATION	(z) MASS	CONCRETENTATION	(2) = 200						
h. Oil and 3rees		х												
Phosphorus (es P), Total (7723-14-0)		Х		•										
. Redirectivity		L			A STATE OF THE PARTY OF THE PAR		780 C. 15		-					
1) Alphe, Fotel		х												
2) Bets, Fotol		х		 										
3) Redium, Fotel		х												
4) Radium 226, Total		х		·										
c. Bulfate (et 804) (14808-79-8)		х												
l. Sulfide (ey B)		х	7											
rn, Buffite (ar 803) (14265-45-3)		Х						·						
n. Surfactions		Х												<u> </u>
o. Aluminum, Totel (7429-90-5)		х												
p. Berl um, Total (7 440-39- 3)		х												
i. Boron, Tetal (7440-42-8)		х								_				
r. Cobelt, Total (7440-48-4)		×												
7439-89-6)		х												
t Magneelum, Total (7 430-9 5-4)		х												
. M elybdenum, Total (7 439-98-7) ;	,	х												
Mangensee, Total 7438-96-5)		X												
v. Tin, Total 7440-31-5)		х												
x. Titanium, Total (7 440-32-6)	' '	х												

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CONTINUED FROM PAGE 3 OF FORM 2-C

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2o-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenois. If you are not required to mark column 2-a (ascondary industries, non-process weetings) outfalls, and non-paguined GC/MS fractions), mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant, you must provide the results of at least one analysis for that pollutant. Note that there are seven pages to this part; please review each carefully. Complete one table (all seven pages) for each outfail. See instructions for additional details and requirements.

1. POLLUTANT	2.	MARK	'X'			3, 1	EFFLUENT			1	4, U	NITS		FAKE (opti	
AND CAS NUMBER	& TEST	D.se-	C ex-	a. MAXIMUM D	AILY VALUE			CLONG TERM	AVRG. VALUE	d NO.OF	IN. CONCERT	b. MASS	H. LONG	TERM E VALUE	I. NO.O ANAL YSES
(if available)	QUIN-	PRE-	SENT	(I)	(z) MASS	(1)	(2) MASS	(1) CONCENTRATION	(2) MASS	ANAL YSES	TRATION	b. m. A. J.	(I) CONCEN-	(2) MASS	YSES
METALS, CYANID	E, AN	TOT	AL PH												
IAI, Antimony, Fotal (7440-36-0)			х												<u></u>
ZM, Arsenic, Total (7440-38-2)			х												
3M. Beryllium, 1 ctal, 7440-41-7)			х												
4M, Cadmium, Total (7440-43-9)			х												
3M. Chromium, Total (7440-47-3)			х												
3M. Copper, Total 7350-50-8)			х		-			·							
/M. Lead, Total 7439-97-6)			х												
1M. Mercury, Total 7439-97-6)			х												
14 Nickel, Total 7440-02-0)			х												
ON: Selenium, Intel (7782-49-2)			Х												
1M. Silver, Total 7440-22-4)			х		······································										Ť. · /
2M. Thailium, otal (7440-28-0)		7	х												
UM. Zinc, Total 7440-66-6)	. `		х												
4M. Cyanide, osaf (57-12-5) ;			х												
ISM. Phenois,		13	X												
NIXON	············			<u> </u>	· ··			3 M			L		<u> </u>		
1,3,7,8-Tetra- hioradibenzo-P- hioxin (1764-01-6)	J		Х	DESCRIBE RES	JLTS							,			

POLLUTANT		FRON			1	/3.1	FFLUENT				4. UI	RITS	5. IN	TAKE (option	onal _i .
ANDCAC						TO MAXIMUM 3	DAY VALUE	CLONG TERM	AVRG. VALUE	d NO.OF			a. LON	TERM EVALUE	ti NO.
NUMBER (if evailable)	ING	LILVE	C BE-	a. MAXIMUM D				(1) CONCENTRATION	(2) MASS	ANAL- YSES	a. CONCEN- TRATION	U. MASS	(I) CONCER	1/) WASS	ANA
	ــنطحا. بها		4		(4) MASS .	CONCENTRATION	(z) MASS	CONCENTRATION	(2) = 255				TE ATION	}	
CAUS FRACTION	- VO	LATIL	E COM	POUNDS				 		 			†		 -
v. Acrolein :::07-02-8)			x											 	
. Acrylonitrile 07-13-1)			x											<u> </u>	-
V. Benzene 1-43-2)			х						_	1					Ŀ
V. Bis (Chloro- etnyl) Ether (42-88-1)			х							;					
V. Bromoform 19-25-2)			х							T				<u> </u>	
d. Carbon etrachloride (6-23-5)			x								,				
v. Chlorobenzene 08-90-7)			x												
v. Chlorodi- comomethane (24-48-1)		-	x												
V. Chloroethane			x									,			
07. 2-Chloro- hylvinyl Ether 10-75-8)			х												
IV. Chloroform 57-66-3)			х												
V. Dichloro- romomethene (5-27-4)			Х												
77. Dichloro- Euoromethane € 71-8)			х												
1V. 1,1-Dichloro- hane (75-34-3)			х							,					
V. 1,2-Dichloro- hane (107-06-2)		-	х	1											1
V. 1,1-Dichloro- hylene (75-35-4)		7.1	х												
7V. 1/2-Dichloro- opana (78-87-5)			х												
3V. 1,3-Dichloro- cpylene 42-75-6)			х			·									
V. Ethylbenzene 00-41-4)			х												
CV, Methyl romide (74-83-9)			x		*************************************										
1V. Methyl n'aride (74-87 3)	1		x												1

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CONTINUED FROM	PAGE	V-4			MA	D 000 361	709		001	<u> </u>		Approval exp	lres 3-31-84		
1. POLLUTANT		MARK	'X'		THE WAY	A Land	EFFLUENT	4 4 . Lane 1 4. 4 . 4 . 1 . 1 . 1 . 1	×		4. UP	IITS		AKE (option	nal)
AND CAS NUMBER	A TEST	h es-	C 08-	& MAXIMUM	AILY VALUE	B. MAXIMUM 3	DAY VALUE	LONG TERM	VRG. VALUE	d NO.OF	a. CONCEN-	b. MASS	AVERAG		D. NO.O
		PENT PRE- PENT			(z) mass	CONCENTRATION	(s) wees	SPACE TRATION	FEAM (S)	YSES	TRATION		(I) CONCEN-	(2) MASS	YSES
GC/MS FRACTION	- VO	LATIL	E CON	POUNDS (contin	nued)										
22V, Methylene Chloride (75-09-2)			x												
23V. 1,1,2,2-Tetra- chieroethene (79-34-6)			х						•						
24V. Tetrachioro- ethylene (127-18-4)			х		; !					1					
25 V, Toluene !1 08-88-3)			x							i					
26V, 1,2-Trans- Dichloroethylene (158-60-5)			Х												
27V, 1,1,1-Tri- thieroethene (71-55-6)			х											(
28 V. 1,1,2-Tri- :hi oroethene :79 -00-5)			х												1
29V, Trichloro- athylene (79-01-6)			х												
30V, Trichloro- iuoromethane 75-69-4)			Х												
31V. Vinyl Interide (75-01-4)			х												
CAMS FRACTION	- AC	D CON	APOUN	DS									ļ		
A. 2-Chlorophenol 95-57-8)			X												
A. 2,4-Dichloro- henel (120-83-2)			Х									L			
3A. 2,4-Dimethyl- hanel (105-67-9)			X												
A. 4,6-Dinitro-O- cresol (534-52-1)			X												()_
A. 2,4-Dinitro- thenol (51-28-5)			X	ł					,						
A. 2-Nitrophenol 88-75-5)	,	e .	X												
A. 4-Nitrophenol 100-92-7)			х		·			•							
A. P-Chloro-M-, cresol (59-50-7)		10 T	х												
A. Pentachloro- henol (87-86-5)		5.4	X			·									
:0A, Phenol 198- 9 5-2)	<u></u>		X			:									
1A, 2,4,6-Tri- hierophenol 38-06-2)	: -		X			·									

NTINUED FROM	K 5 2 7		2.	THE BUILD IN	POLICE CONTRACTOR	The Maria Control	er tagen and			11 1	4; UI	NITS		TAKE (option	onal)
AND CAS	-		48.8	A		1 0.1			THE PERSON	4 NO. OF	CONCEN		A. LONG	TERM	b. NO.
Med Cas		蓝	76.	COMPOUNDS	The West State	transmission of the state of th	21,1045	18.1 3.4	THE DESIGNATION OF THE PARTY OF	ANAL-	a, CONCEN- TRATION	b. MA85	(1) CONCEN-	(z) MASS	XSE:
ON PRACTION	RA	E ALC	TRA	COMPOLINDS		THE STANCE	Education of the	200	1345 (452)						
			Х			1.1.1.20 MICROST - 2.4.2.4.1	district the state of the state								
instancy in the			x										1		
			X		· · · · · · · · · · · · · · · · · · ·					.1					
p mestaline (act 7-5)			x												
(0.96-3)			x												
(B. 30020 to) (B. 30020 to) (Miles (50-32-8)			X							 					5
(i. \$,4-tanito- lucisinthania 2(486-2) :			X												
School (ph() arginno (p)(44-2)			X												<u> </u>
191-94-2) HE: Benzo (k.) Fluitenthese 231-08-9)							· · · · · · · · · · · · · · · · · · ·								
233-(8-9) G& Bis (3-Chloro- thisty) Magnese 115-91-1)			X												1
19-91-1) 18: Bit (3-Chiaro- ligil Ether 113-66-6)			X												-
25; Bis (3-Chiero- correct) Epter 20(58-32-6)			X						· ·					<u> </u>	-
20(28-32-6) 39, Bis (2-(2thyl- edgi) Phtheless 17(-61-7)			X							 -					
1 12-81-7) 48/4-Brome- - whit Phenyl ther (101-68-3)			X.						ļ	 					
ther (101-68-2) 56: Butyl Senzyl hishalete (85-68-7)			X							<u> </u>					1
intheless (85-88-7)			X											 	{ }
91 48-7) 7 8.4-Chiore		Vice	X										·	· · · · · · · · · · · · · · · · · · ·	-
http://heny) ther (7069-72-3) 89. Chrystne			Х			 				ļ					
89. Chrystne 2 (\$-01-0). 88. Diberto (a,h)			X			**************************************				ļ		· · · · · · · · · · · · · · · · · · ·	ļ		-
S Disenso (a,h) Indersons 53-70-3)			Х											· · · · · · · · · · · · · · · · · · ·	-
attene (05-50-1)			X												
18 1,3-D chiors- espene (541-73-1)	!		X												<u> </u>

EPA I.D. NUMBER (copy from Item 1 of Form 1) OUTFALL NUMBER
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CONTINUED FROM PAGE V-6 5. INTAKE (optional) 1. POLLUTANT 4. UNITS 3. EFFLUENT 2. MARK 'X' AND CAS A LONG TI RM MAXIMUM 30 DAY VALUE CLONG TERM AVRG. VALUE d NO. OF NOO ATKET D. BE- C. BE- A. MAXIMUM DAILY VALUE
OUTS- PRAT SENT CONC. NEATION (2) MASS. . CONCEN ANAL b MASS ANAL-(I) CONCIN TRATION (.) MASS YSES OPHCENTHATION (if evailable) (z) MASS (2) MASS GCAMS FRACTION - BASE/NEUTRAL COMPOUNDS (continued) 228, 1,4-Dichlorobenzene (106-46-7 X 238, 3,3'-Dichtorobenzidine X (91-94-1) 248. Diethyl Phthelate X (84-86-2) 258. Dimethyl Phthelate X (131-11-3)268. DI-N-Butyl Phthelate X (8474-2) 278. 2,4-Dinitrotoluene (121-14-2) Х 298. 2,6-Dinitrotoluene (606-20-2) Х 298. DI-N-Octyl Phthalate X (117-84-0) 306. 1,2-Diphenyihydrexine (as Azo-X bansene) (122-66-7 318. Fluorenthene (206-44-0) X 328. Fluorene (86-73-7) X 338. Hexachlorobenzene X (118-71-1) 348. Hexach: probutadiene X (B7-68-3) 35B. Hexachiorocyclopentadiene X (77-47-4)35B. Hexachloroethane (67-72-1) X 378, Indeno (1,2,3-cd) Pyrene X (193-39-5) 38B. Isophorane (18-59-1) X 39B. Naphthalane (91-20-3) X 40B. Nitrobenzene (98-95-3)X 41B. N-Nitrosodimethylamine X (82-75-9) 42B, N-Nitrosodi-N-Propylamine X (321-64-7)

ONTINUED FROM	_		_	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		* 1	FEL HENT				4. UP	IITS		TAKE (optio	onal).
AND CAS		MARK				3. Th. MAXIMUM 2	EFFLUENT	CLONG TERM	AVEG. VALUE	d NO.OF			LONG	TERM	b NO.
NUMBER	A TEST	LILVED PRAT	C OF	a. MAXIMUM	·····	(I) qua		(if ava	(2) MASS	ANAL	A. CONCEN- TRATION	b. MASS	(I) CONCEN-	[/] MAES	YSE
					(2) MASS	CONCENTRATION	(2) mass	CONCENTRATION	(2)				VARIO		1
CAMS FRACTION	- BA	SE/NE	JTRA	L COMPOUNDS	continued)			 		 			 		1
38, N-Nitro- odiphenylemine 86- 30-6)			X										 		
48, Phenanthrena 65-01-8)			X							<u> </u>			ļ		
53. Pyrene 129-00-0)			X												-
168. 1,2,4 - Tri- hiorobenzene 120-82-1)			X							<u> </u>					
C/MS FRACTION	- PE	STICID	ES										 	ļ	
P. Aldrin 309-00-2)			х												
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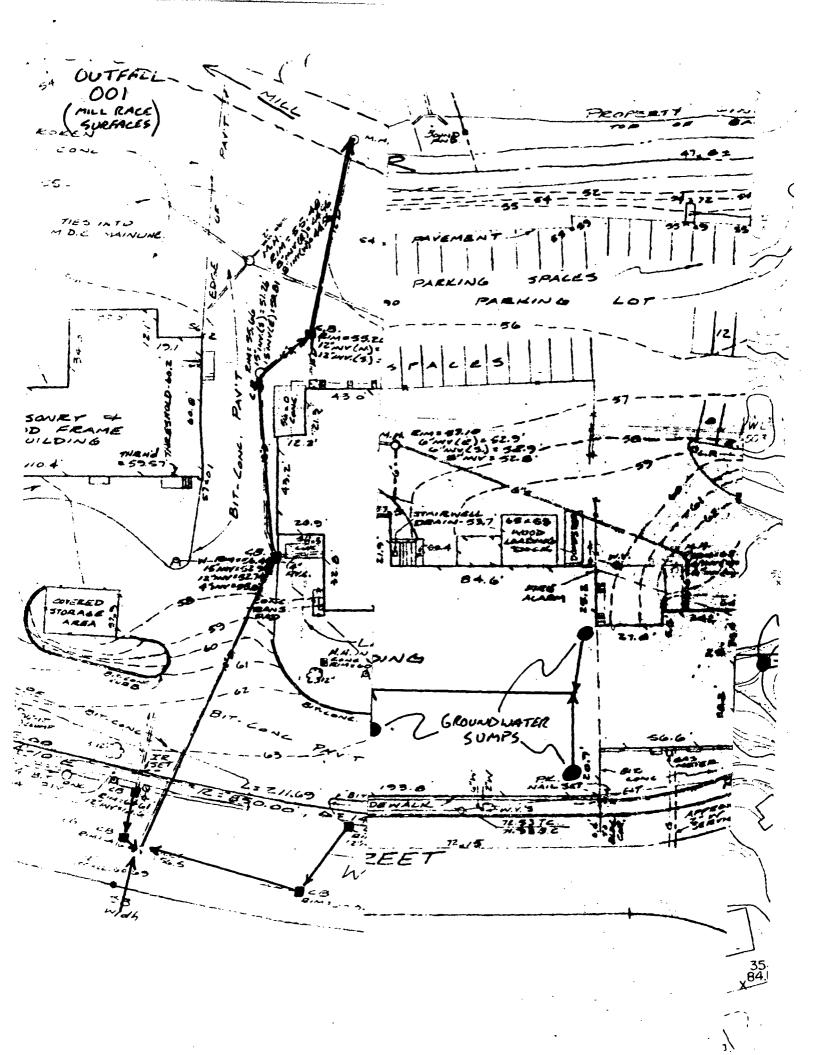
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MAD 000 361 709 001

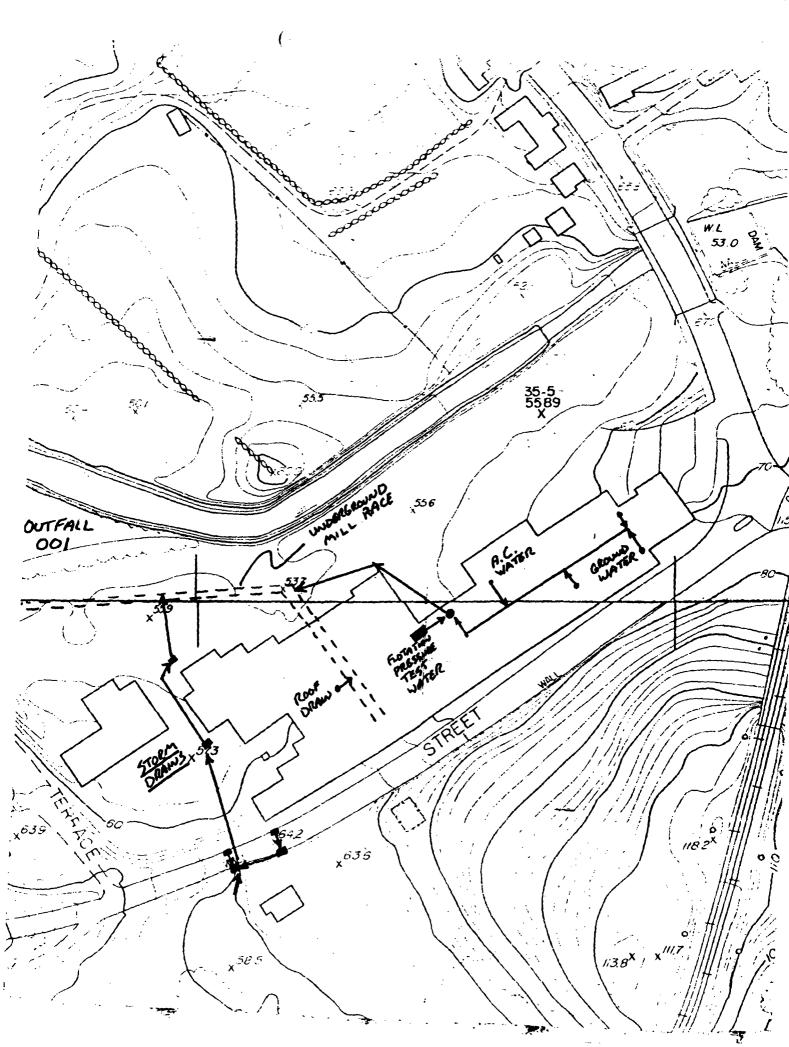
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P.A Form 3510-2C (Rev. 12-80)

PAGE V-9





- R. P. Porter
- J. P. Nardelli
- J. J. Cohenno
- J. S. Colageo H. J. Gaffney
- R. S. Brooks
 - R. R. Riolo



CHEMICAL WASTE MANAGEMENT OF MA., INC. 5 Strathmore Rd. Natick, MA 01760 (617) 655-8863

PCB CRITERIA FOR CHEMICAL WASTE MANAGEMENT, INC., EMELLE, ALABAMA

Thank you for your inquiry concerning Chemical Waste Management, Inc., and the disposal of PCB material. Chemical Waste Management, Inc., a wholly-owned subsidiary of waste management, inc., with corporate offices located in Oak Brook, Illinois, owns and operates a hazardous waste disposal site in Emelle (Sumter County), Alabama.

Chemical Waste Management, Inc., warrants that this site is fully permitted to dispose of the following PCB materials.

(1) PCB - All solids (Contaminated debris, soil, rags, clothing, etc.) may be landfilled.

Required Information: Indicate the nature of the solid (e.g. "steel piping", dirt and gravel" etc) and the range of concentration of PCB contamination (e.g. 50-500ppm", "0.01 to 0.5%", 20 pounds of PCB's per 1000 pounds of earth", etc.)

(2) PCB Liquids - PCB contaminated liquids containing less than 500 ppm PCB with a flash point greater than 140° F. may be landfilled.

Required Information: A certification of PCB content and flash point must be supplied prior to shipment.

(3) PCB Liquids - PCB liquids containing more than 500 ppm PCB and/or a flash point less than 140°F. may be disposed of in accordance with all applicable regulations by incineration on our Chemical Waste Management, Inc., Ocean Incineration Vessel, the MT. "Vulcanus".

Required Information: A statement as to the origin of the material (e.g. PCB liquid and rinse drained from a transformer)

(4) Transformers - All transformers must be drained and flushed in accordance with U. S. EPA regulations prior to landfilling. Chemical Waste Management can also provide a total turnkey service for transformers, including transportation, draining and flushing, and disposal

Required Information: Manufacturer, serial number if known, weight dimensions, and date removed from service.

- (5) Capacitors U. S. EPA, has banned the landfilling of PCB capacitors which contains three *(3) pounds or more of dielectric fluid. Small capacitors containing less than three (3) pounds of dielectric fluid may be landfilled.
 - * A good "rule of thumb" to determine the amount of PCB liquid a capacitor contains, is to weigh the capacitor and use one-fourth (1) of the total weight as the amount of PCB liquid. Remember...this is just a "rule of thumb"



CHEMICAL WASTE MANAGEMENT, INC. 5 Strathmore Rd. Natick, MA 01760 (617) 655-8863

Required Information:

- A. The number of the drum or container (i.e. "drum #3").
- B. The number of individual capacitors within a drum.
- C. The outside dimensions of the capacitor(s).
- D. The serial number, make, model, etc., if available.
- E. A certification that each capacitor included contains less than three (3) pounds of dielectric fluid.

Contanerization and Marking

40 CFR, Part 761 provides specific requirements for packaging and marking of PCB items for disposal. Attached are copies of parts of sections 761.20, 761.42 and 761.44 which may prove helpful.

Note also that:

- 1. Solids should be filled to within four inches of the top of the drum with absorbent.
- 2. Liquids to be incinerated must be free of sludge.
- 3. Drums with capacitors should be filled within four inches of the top of the drum with absorbent.



CHEMICAL WASTE MANAGEMENT OF MASSACHUSETTS, INC. 5 Strathmore Rd. Natick, MA 01760 (617) 655-8863

PCB REQUIRED INFORMATION

YOUR ANY NAME						
COMPANY NAME	· — — · · · · · · · · · · · · · · · · ·					<u> </u>
MAILING ADDRESS_						
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TYPE OF MATERIAL				· ·		
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				****	-	
I hereby certify applicable Feder				and is in con	pliance with	
AUTHORIZED SIGNA				TITLE	 _ <u>.</u>	 -
NAME (Printed or						
PHONE NUMBER - A)	· · · · · · · · · · · · · · · · · · ·			-



ANNEX V

\$761.44 Marking formats.

The following formats shall be used for marking:

(a) Large PCB Mark—M_L. Mark M_L shall be as shown in Figure 1, letters and striping on a white or yellow background and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. The size of the mark shall be at least 15.25 cm (6 inches) on each side. If the PCB Article or PCB Equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 5 cm (2 inches) on each side.

(b) Small PCB Mark—M. Mark M. shall be as shown in Figure 2, letters and striping on a white or yellow background, and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. The mark shall be a rectangle 2.5 by 5 cm (1 inch by 2 inches). If the PCB Article or PCB Equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 1 by 2 cm (.4 by .8 inches).

Chapter I—Environmental Protection Agency

§ 761.45

CAUTION

CONTAINS

PCBs

(Polychlorinated Biphenyls)

A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 CFR 761—For Disposal Information contact the nearest U.S. E.P.A. Office.

In case of occident or spill, call toll free the U.S. Coast Guard National Response Center: 800:424-8802

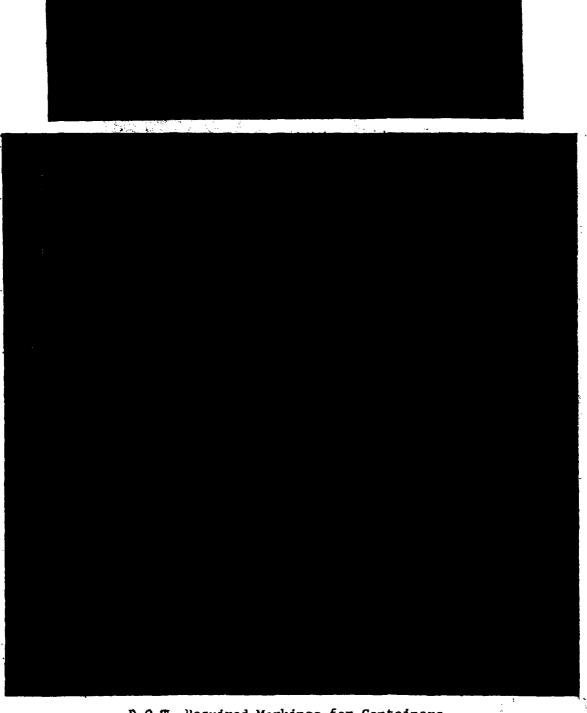
Also Contact Tel. No.

Figure 1

CAUTION CONTAINS PCBs

FOR PROPER DISPOSAL INFORMATION CONTACT U.S. ENVIRONMENTAL PROTECTION AGENCY

Figure 2



D.O.T. Required Markings for Containers

- 1. "ORM-E"
- 2. "RQ"
- 3. "PCB" or "Polychlorinateo Biphenyls"
- 4. "UN2315" (As of 7/83)

C—Marking of PCBs and PCB

1.20 Marking requirements.

(a) Each of the following items in xistence on or after July 1, 1978 shall e marked as illustrated in Figure 1 in nnex V—§ 761.44(a): The mark illustrated in Figure 1 is referred to as M_L hroughout this subpart.

(1) PCB Containers;

(2) PCB Transformers at the time of nanufacture, at the time of distribution in commerce if not already narked, and at the time of removal

rom use if not already marked. Marking of PCB—Contaminated ransformers is not required];

- (3) PCB Large High Voltage Capaciors at the time of manufacture, at the me of distribution in commerce if not iready marked, and at the time of reloval from use if not already marked; (4) Equipment containing a PCB ransformer or a PCB Large High oltage Capacitor at the time of manfacture, at the time of distribution in mmerce if not already marked, and t the time of removal of the equipent from use if not already marked; (5) PCB Large Low Voltage Capaciirs at the time of removal from use; (6) Electric motors using PCB coolnts (See also paragraph (e) of this
- (7) Hydraulic systems using PCB hyaulic fluid (See also paragraph (e) of its section);
- (8) Heat transfer systems (other ian PCB Transformers) using PCBs ice also paragraphs (c) of this secon):
- (9) PCB Article Containers containers articles or equipment that must be arked under paragraphs (a) (1) rough (8) above;

(10) Each storage area used to store CBs and PCB Items for disposal.

- (b) As of October 1, 1978, each transrt vehicle shall be marked on each d and side with M, as described in mex V—§ 761.44(a) if it is loaded th PCB Containers that contain re than 45 kg (99.4 lbs.) of PCBs in e liquid phase or with one or more .B Transformers (See also paraaph (e) of this section).
- c) As of January 1, 1979, the follow: PCB Articles shall be marked with rk M_L as described in Annex V—61.44(a):
- 1) All PCB Transformers not rked under paragraph (a) of this tion (marking of PCB-Contaminat-Transformers is not required);
- 2) All PCB Large High Voltage Calitors not marked under paragraph of this section
-) Will be marked individually with tk M₁, or
- i) If one or more PCB Large High marking requirements tage Capacitors are installed in a tected location such as on a power , or structure, or behind a fence;

the pole, structure, or fence shall be marked with mark $M_{\rm t}$, and a record or procedure identifying the PCB Capacitors shall be maintained by the owner or operator at the protected location.

(d) As of January 1, 1979, all PCB Equipment containing a PCB Small Capacitor shall be marked at the time of manufacture with the statement, "This equipment contains PCB Capacitor(s)". The mark shall be of the same size as the mark M.

(e) As of October 1, 1979, applicable PCB Items in paragraphs (a)(1), (6), (7), and (8) containing PCBs in concentrations of 50 to 500 ppm and applicable transport vehicles in paragraph (b) loaded with PCB Containers that contain more than 45 kg (99.4 lbs.) of liquid PCBs in concentrations of 50 ppm to 500 ppm shall be marked with mark M_L as described in Annex V—§ 761.44(a).

(f) Where mark M_L is specified but the PCB Article or PCB Equipment is too small to accommodate the smallest permissible size of mark M_L mark M_s as described in Annex V—§ 761.44(b), may be used instead of mark M_L.

(g) Each large low voltage capacitor, each small capacitor normally used in alternating current circuits, and each fluorescent light ballast manufactured ("manufactured", for purposes of this sentence, means built) between July 1, 1978 and July 1, 1998 that do not contain PCBs shall be marked by the manufacturer at the time of manufacture with the statement, "No PCBs". The mark shall be of similar durability and readability as other marking that indicate electrical information, part numbers, or the manufacturer's name. For purposes of this paragraph marking requirement only is applicable to items built domestically or abroad after June 30, 1978.

(h) All marks required by this subpart must be placed in a position on the exterior of the PCB Items or transport vehicles so that the marks can be easily read by any persons inspecting or servicing the marked PCB Items or transport vehicles.

(i) Any chemical substance or mixture that is manufactured after the effective date of this rule and that contains less than 500 ppm PCB (0.05% on a dry weight basis), including PCB that is a byproduct or impurity, must be marked in accordance with any requirements contained in the exemption granted by EPA to permit such manufacture and is not subject to any other requirement in this subpart unless so specified in the exemption. This paragraph applies only to containers of chemical substances or mixtures. PCB articles and equipment into which the chemical substances or mixtures are processed, are subject to the marking requirements contained else-

CONTAINERS

§ 761.42

marked non-leaking continers. And spired or leaked material shall be intediately caned up using sorients or other adequate means, and the PCB-unitaminate materials and reduce shall be discosed of indiccordince with § 761/104/(4).

(6) Except as provided in paragraph (c)(7) below, any container used for the storage of liquid PCBs shall comply with the Shipping Container Specification of the Department of Transportation (DOT), 49 CFR 178.80 (Specification 5 container without removable head), 178.82 (Specification 5B container without removable head), 178.102 (Specification 6D overpack with Specification 2S(§ 178.35) or 2SL(§ 178.35a) polyethylene containers) or 178.116 (Specification 17E.container). Any container used for the storage of non-liquid PCBs shall comply with the specifications of 49 CFR 178.80 (Specification 5 container), 178.82 (Specification 5B container) or 178.115 (Specification 17C container). As an alternate, containers larger than those specified in DOT Specifications 5, 5B, or 17C may be used for non-liquid PCBs if the containers are designed and constructed in a manner that will provide as much protection against leaking and exposure to the environment as the DOT Specification containers, and are of the same relative strength and durability as the DOT Specification containers.

(7) Storage containers for liquid PCBs can be larger than the containers specified in paragraph (c)(6) above

provided that:



Chemical Waste Management, Inc.

555 Metro Place North Suite 525 Dublin, Ohio 43017 614/766-1100

April 9, 1984

Mr. Jay McNeff
Emerson & Cuming Unit
W. R. Grace & Company
59 Walpole Street
Canton, Massachusetts 02021

Dear Mr. McNeff:

Due to the lengthy delays in obtaining an EPA permit for our ocean incineration vessel, the VULCANUS, and not wanting to exceed our permit limitations on PCB storage, we have implemented a new policy and procedure for handling the incineration of PCB materials.

PCB materials requiring incineration will be shipped first to our facility in Emelle, Alabama, where all necessary servicing and consolidation will be performed and the portions requiring incineration will be delivered by Chemical Waste Management, Inc. to an EPA approved PCB incinerator. Once destruction takes place, incineration certificates will be issued upon request.

Thank you for considering Chemical Waste Management, Inc. for your disposal needs.

Sincerely,

CHEMICAL WASTE MANAGEMENT, INC.

Bret Dyer Sales Engineer

BD:sh

REFERENCE NUMBER NAT D82566

WASTE TRANSPORTATION AND DISPOSAL AGREEMENT

On this 7th day of March 1984, the parties, Emerson and Cuming a Research Constitution with its principal offices at 1994 corporation with its principal offices at 1114 ANEWE of W. AMERICALS NEW YORK, NY 100 36. (hereinafter called "Generator"), and Chemical Waste Management, Inc., a Delaware corporation with its principal offices at 3003 Butterfield Road, Oak Brook, Illinois 60521, (hereinafter referred to as "Disposer"), have agreed as follows:

- WASTE MATERIALS. During the term of this Agreement, Generator will provide to Disposer Generator's entire output of certain waste materials generated at Emerson and Cuming, Canton, Massachusetts, (up to a maximum of one load per one time), the chemical composition and physical characteristics of which materials are described in the "Generator's PCR Waste Material Description Sheet", Code designation Reference Number D82566, attached hereto, and incorporated herein.
- 2. DISPOSER SERVICES. Disposer agrees to provide Generator the following services. as described in one or more of the following sections:
- a. Transportation of (2) two five gallon pails containing PCB liquid (greater than 500 ppm) from Emerson and Cuming, Canton, Massachusetts to the disposal facility as listed in Section b. following.
- b. Transportation and disposal of the PCB liquid containing more than 500 ppm, in a manner permitted by law, at the following facility: MT "Vulcanus", Ocean Incineration Vessel, at the U.S.E.P.A. designated burn site.
- FEES AND BILLING. For those services provided by Disposer, Generator will pay Disposer a fee as follows:

Transportation and disposal of (2) two five gallon pails containing PCB liquid (greater than 500 ppm).......\$150.00

Chemical Waste Management, Inc., will not accept any PCB materials for incineration which have been in storage for disposal by Generator for more than six months at the time of delivery to Chemical Waste Management, Inc.

The fees set forth are subject to change at any time during the term hereof upon Disposer providing Generator with at least thirty (30) days advance written notice.

The fee stated above shall be increased to include any amounts which Disposer is required to pay to local, state or Federal governments or agencies by virtue of a tax, tariff, fee, surcharge or other charge on the transportation, storage, treatment or disposal of the described waste materials. Such amounts will be invoiced to the Generator as a separate item on monthly statements. Disposer shall submit statements to Generator which shall be paid not later than thirty (30) days from date of receipt. Disposer shall retain copies of statements for at least five (5) years, as a record of disposal.

4. TERM. This Agreement shall have a term of one year from the date hereof, unless some shorter period is hereafter entered: May 7, 1984. Either party may terminate this Agreement, with or without cause, upon thirty (30) days' written notice to the other party.

5. TRANSFER OF WASTES AND TITLE. Generator's waste materials, so described, will be transferred to Disposer at the following place, times, frequencies and quantities.

Emerson and Cuming Canton, Massachusetts

As scheduled between the parties. During normal business hours Monday thru Friday excluding legal holidays.

At the time Disposer takes possession of, and removes, waste materials from the place of transfer, or at the time Disposer accepts delivery of the waste materials at the designated storage or disposal facility, whichever circumstance is applicable, title, risk of loss and all other incidents of ownership to the waste materials shall be transferred from Generator and vested in Disposer.

In the event waste materials are discovered to be nonconforming, Disposer may revoke its acceptance of the materials. A justified revocation of acceptance shall operate to revest title, risk of loss and all other incidents of ownership in Generator, at the time revocation is communicated to Generator. Waste materials shall be considered nonconforming, for purposes of this Agreement: (i) if they are not in accordance with the descriptions, limitations or specifications stated in the attached Waste Material Description Sheet; or (ii) if they have constituents or components, not specifically identified in the Generator's PCB Waste Material Description Sheet, (a) which increase the nature of extent of the hazard and risk undertaken by Disposer in agreeing to handle, load, transport, store, treat or dispose of the waste materials, or (b) for whose storage, treatment or disposal the Disposal Facility is not designed or permitted.

Waste Materials discovered by Disposer to be nonconforming, if they are in Disposer's possession, shall be prepared for lawful transportation and returned to Generator within a reasonable time, not to exceed seven days, after notice of revocation of acceptance has been communicated to Generator, unless within such time the parties agree to some alternative lawful manner of materials disposition. Generator shall pay Disposer its reasonable expenses and charges for handling, loading, preparing, transporting, storing and caring for nonconforming waste materials returned to Generator under this paragraph.

- 6. DISPOSER WARRANTIES. Disposer warrants that: it understands the currently known hazards which are presented to persons, property and the environment in the transportation, storage and disposal of the described waste materials; it will transport, store and dispose of such materials in full compliance with all governmental laws, regulations and orders; the storage and disposal facilities above described are now licensed and permitted to store and dispose of waste materials within the description of Paragraph 1: and, in the event the storage or disposal facility loses its permitted status hereafter during the term of this Agreement, disposer will promptly notify Generator of such loss.
- 7. GENERATOR WARRANTIES. Generator warrants that: the description of its waste materials, made in Paragraph 1, is true and correct; waste materials to be transferred to Disposer will conform to such description; containers of waste materials transferred to Disposer will be marked, labeled and otherwise in conformance with governmental laws, regulations and orders; he holds clear title to all waste materials to be transferred hereunder; he is under no legal restraint or order which would prohibit transfer of possession or title to such materials to

Disposer for transportation and storage or disposal; he has, and will during the term hereof, communicate to Disposer those hazards and risks known or learned by the Generator to be incident to the handling, transportation, storage and disposal of the waste materials; if the waste materials are hazardous wastes as defined pursuant to Section 3001 of the Resource Conservation and Recovery Act, the Generator has made any notifications required by Section 3010 of that Act and the Generator will comply with pertinent regulatory requirements established pursuant to Section 3002 of that Act, including the manifest requirement; he will comply with the relevant requirements of 40 CFR, Part 761: if the waste materials are, or contain, hazardous substances as defined pursuant to Section 101 (14) of the Federal Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Generator will advise Disposer, in writing, prior to tendering or delivering to Disposer any vehicular load of waste materials containing a reportable quantity of any hazardous substances or substances pursuant to Section 102 of said Act, specifying those hazardous substances present in a reportable quantity.

8. INDEMNIFICATION. Disposer agrees to indemnify, save harmless and defend the Generator from and against any and all liabilities, claims, penalties, forfeitures, suits, and the costs and expenses incident thereto, (including costs of defense, settlement and reasonable attorneys' fees), which it may hereafter incur, become responsible for or pay out as a result of death or bodily injuries to any person, destruction or damage to any property, contamination of or adverse effects on the environment, or any violation of governmental laws, regulations or orders, caused, in whole or in part, by (i) Disposer's breach of any term or provision of this Agreement; or, (ii) any negligent or willful act or omission of the Disposer, its employees or subcontractors in the performance of this Agreement.

Generator agrees to indemnify, save harmless and defend the Disposer from and against any and all liabilities, claims, penalties, forfeitures, suits, and the costs and expenses incident thereto, (including costs of defense, settlement and reasonable attorneys' fees), which it may hereafter incur, become responsible for or pay out as a result of death or bodily injuries to any person, destruction or damage to any property, contamination of or adverse effects on the environment, or any violation of governmental laws, regulations or orders, caused, in whole or in part, by (i) Generator's breach of any term or provision of this Agreement; or, (ii) any negligent or willful act or omission of the Generator, its employees or subcontractors in the performance of this Agreement.

9. INSURANCE. Disposer shall procure and maintain, at its expense, during the term of this Agreement, at least the following insurance, covering activities, performed under, and contractual obligations undertaken in this Agreement:

	COVERAGE	LIMITS
(a)	Workmen's Compensation	Statutory
(b)	Employer's Liability	\$500,000 each occurrence
(c)	Public Liability (bodily injury)	\$5,000,000 combined single limit
(d)	Public Liability (property damage)	Same as (c) above

(e) Automobile Liability (bodily injury)

\$200,000 each person \$500,000 each occurrence

(f) Automobile Liability (property damage)

\$50,000 each occurrence

Disposer agrees to furnish insurance certificates, showing Disposer's compliance with this Section, upon written request of the Generator.

- 10. WORK ON GENERATOR'S PREMISES. Generator agrees to provide Disposer, its employees and subcontractors a safe working environment for any work, in performance of this Agreement, which must be undertaken on premises owned or controlled by the Generator. Disposer, its employees and subcontractors shall comply with the Generator's safety procedures while on the Generator's premises, provided such procedures are conspicuously and legibly posted in the working area or have been delivered, in writing, to Disposer prior to the commencement of work on the Generator's premises.
- 11. INDEPENDENT CONTRACTOR. Disposer is and shall perform this Agreement as an independent contractor, and as such, shall have and maintain complete control over all of its employees, agents, and operations. Neither Disposer nor anyone employed by it shall be, represent, act, purport to act or be deemed to be the agent, representative, employee or servant of the Generator.
- 12. INSPECTIONS. The Generator shall have the right to inspect and obtain copies of all written licenses, permits or approvals, issued by any governmental entity or agency to Disposer or its subcontractors which are applicable to the performance of this Agreement; to inspect and test, at its own expense, transportation vehicles or vessels, containers or disposal facilities provided by Disposer; and to inspect the handling, loading, transportation, storage or disposal operations conducted by Disposer in the performance of this Agreement. Such inspections are encouraged by Disposer.
- 13. EXCUSE OF PERFORMANCE. The performance of this Agreement, except for the payment of money for services already rendered, may be suspended by either party in the event the delivery or transportation of the described waste materials by Generator, or transportation, storage or disposal of such materials by Disposer are prevented by a cause or causes beyond the reasonable control of such party. Such causes shall include, but not be limited to, acts of God, acts of war, riot, fire, explosion, accident, flood, or sabotage; lack of adequate fuel, power, raw materials, labor or transportation facilities; governmental laws, regulations, requirements, orders or actions; breakage or failure of machinery or apparatus; national defense requirements; injunctions or restraining orders; labor trouble, strike, lockout or injunction (provided that neither party shall be required to settle a labor dispute against its own best judgment).
- 14. DELEGATION AND ASSIGNMENT. Disposer may at any time, upon written notice to the Generator, delegate, orally or in writing, the performance of the work, or any portion thereof, which is by this Agreement undertaken by Disposer; provided, however, Disposer may not, without the prior written consent of Generator, cause the storage or disposal of the waste materials at any facility other than those specified in Section 2 (b) of this Agreement. Any such delegation shall not operate to relieve Disposer of its responsibilities hereunder and, notwithstanding any such delegation, Disposer shall remain obligated to the Generator in these undertakings.

Either party may, at any time, upon written notice to the other party, assign its rights under this Agreement.

15. NOTICE. Any notice to be given under this Agreement shall be in writing and delivered to the address of the respective party below:

GENERATOR:

Emerson and Cuming 59 Walpole Street Canton, Massachusetts 02021 Attn: Mr. Jay McNeff

DISPOSER:

Chemical Waste Management, Inc. Five Strathmore Road Natick, Massachusetts 01760 Attn: Bred Dyer

- 16. LAW TO APPLY. The validity, interpretation and performance of this Agreement shall be governed and construed in accordance with the laws of Alabama.
- 17. ENTIRE AGREMENT. This Agreement represents the entire understanding and agreement between the parties hereto relating to the transportation, storage, treatment, processing and disposal of the described waste materials and supersedes any all prior agreements, whether written or oral, that may exist between the parties regarding same and supersedes any and all terms and conditions which may be contained in any purchase orders, issued by the Generator prior or subsequent to this Agreement.

In no event shall the preprinted terms or conditions found on any Disposer or Generator purchase or work order be considered an amendment or modification of this Agreement, even if such documents are signed by representatives of both parties; such preprinted terms or conditions shall be considered null and of no effect.

IN WITNESS WHEREOF, the parties have caused this Agreement to be executed by their duly authorized representatives as of the day and year first above written.

GENERATOR:

EMERSON AND CUMING

By: John + Mc Net

Title: PLANT ENGINEER

DISPOSER:

CHEMICAL WASTE MANAGEMENT, INC.

y: Coordon M. Ci-

Title: Region Manager

bd

CHEMICAL WASTE MANAGEMENT, INC.

GENERATOR'S PCB WASTE MATERIAL DESCRIPTION SHEET

Reference Number NAT D82566

Transportation and disposal of (2) two five gallon pails containing PCB liquid (greater than 500 ppm).

PCB LIQUIDS

PCB liquids must be contained in DOT 17E drums according to EPA specifications, or shipped in bulk, 2,000 gallons or more.

For the incineration of PCB liquids containing greater than 500 ppm PCB and/or a flash point less than 140° F., please send any analytical data to Chemical Waste Management, Inc. prior to shipment.

All containers must be labeled in accordance with the Toxic Substance Control Act, PL 94-469, Subpart "C" and the Federal Register (49 CFR, Part 172.316).

NOTE: In accordance with U.S.E.P.A. regulations, all materials designated for disposal must have notation on the container indicating the date the materials were placed in storage.

 CANDY 20 13 1 5/31
 HERE B PCB CONTRACT (MY COPY-PLEME RETURN)
 IT WON'T HEUP US
T TALKED TO MARK STOCKER NAD REFERRED INC. TO PETER MATONIS HE SAID S.C.A. WOULD BE O.K. IF FINAL INCINERATION LOCATION IS G.E. IN MASS COULD BE DONE SOON
OVERALL WE SHOULD GO BY FINAL INCLUSION FOINT TO DECIDE FAMILITY 19 GOOD / REPUTABLE FINIS OUT WHERE S.C.A. WILL HAVE
THERE PCB'S INCINERATES, 150 , WE SHOULD REQUEST INCINERATION ENTIFICATE TO VERIFY INCINERATION
GIVE ME A CALL ON THIS

in 55 you SCA -> Chicago incerator to SCA Brantie I WM as transporter SCA menenta disposal special instruction on manifest > mequie meentre contification 5CA Chemical Services Inc. SCA MAD 053 452637 Brantie MA

GRACE MEMO

to:

Randy Olson

from:

Paul E. Firestone

subject:

P C B's at Plant II

PRICE IVED

MAY 10 DGA

EMERSO, 10 C 11 ING

CANT date:

May 10, 1984

cc:

G. F. Winterson

J. J. Cohenno

J. S. Colageo

I have talked to Chemical Waste Management regarding the disposal of the P C B's (Araclor 1254) at plant II.

The problem you have been having with C. W. M. disposing of the P C B is that C. W. M.'s storage facilities for P C B's is completely full, as is most other waste compounds around the country, and the E P A will not give anyone permission to dispose of it.

However, C W M would be able to dispose of this for us through S C A services in Braintree, Mass. C W M would act as a hazardous waste transporter for us in this case. The price for disposal of these two 5 gallon pails would be \$375.00. The hazardous waste manifest would have to be made out directly to S C A services.

According to C W M, the \$375.00 price is high, but that is the brokerage price that C W M would have to pay to S C A. If we deal directly with S C A, the price will be higher.

In the mean time, the two five gallon pails should be placed in a 55 gallon drum and packed with oil dry or Speedi Dri (So not use vermiculite) on the bottom, sides and top of the pails.

If you decide to go this way, contact Pat Russo, General Manager, C W M. 431-7942 for details. If you do not want to go this way, the material will have to be put in storage and documented records kept.

Paul E. Firestone

P.S.

S.C.A. Services is the waste disposal company Maureen Dalton used until the time when she was on an inspection trip of their facility, a drum of chemicals exploded, showering her and her party with a gooey liquid. Right after that she switched to C W M.

I have heard several stories and reports about S C A Services in general and the Braintree operation in particular when I started handling the hazardous waste. I don't recall any of the records were ever documented, but from my own point of view, I just have an uneasy feeling about doing business with the Braintree branch of S C A Services.

~	ACE			Dewey and W.R. Grace	-	mical Division	PURCHASE (2-40 THIS NO. TO AFFEAR AND CORRESPONDEN THIS OR LL TO THE LOCATION	00 ALL PACKAGES OF PRETAINING TO DER.
	To .	5 stra	thmore Road , Mass. 01	nnagement, Inc. 1 1760	·	X SUBJECT TO	SO WALPOLE ST., CANTON, N 104 WEST 182nd ST., GARDER 3450 COMMERCIAL AVE., NO 2401 ELLIOTT AVE., TROY, M O STATE SALES TAX CT TO STATE SALES TAX	NA, CALIF. 90248 RTHBROOK, ILL. 60052
PAYME	NT TERMS	F.O.B.		TRANSPORT TERMS	REQUISITIONE	Ŕ	REQUIREMENT DATE	
SHIP V			anton	Pickop	VENDOR NUMB	NEA .	ORDER DATE	sonth -
	OTY. ORDERED	UNIT OF MEASURE	DESCRIPTION O	F GOODS AND/OR SERVICES T	O BE RENDERED.	CODE	UNIT PRICE	ALLOCATION
A	2 (5 gal.)	ea.	Pails wa	aste polychlorina	ated Biphen	yls 7	75.00	2608700
				Confirmi	ng			
					·	FMERSON A	<u> </u>	<u> </u>

RECEIVING SCHEDULE

Dewey and Almy Chemical Division W.R. Grace & Co.

									BL/YER*
1	DATE REC'D	SIGNATURE OF RECEIVER	QTY, RECEIVED	BAL. TO COME	ż	DATE REC'D	SIGNATURE OF HEIZENER	ington	BAL TO COME
A					1				
В					J			. `	10 m
5					K				
5					L				
					×				
7					7		·		
3					0			-	
1					Р				

GENERATOR'S WASTE MATERIAL PROFILE SHEET						
GENERAL INFORMATION						
ENERATOR NAME: LENGTESON T CUMING W.R. GA	ACET CO. TRANSPORTER SHETICAL WASTE PENT					
ACILITY ADDRESS: 59 WALPOLE ST.						
CANTON MA 03021	GENERATOR USEPA LD. 11000361709					
	GENERATOR STATE I.D. MAD 000 36/ 709					
	TILE: PROCESS FNG. PHONE: 6/7-878-3300					
NAME OF WASTE! WASTE OIL N.O.S.						
POCESS GENERATING WASTE: L POMP LUBRICA	Tion					
PHYSICAL CHARACTERISTICS OF WASTE						
COLOR ODOR NONE MILD PHYSICAL S	TATE @ 70°F LAYERS FREE LIQUIDS					
AMISER STRONG SOLID	SEMI-SOLID BI-LAYERED YES NO					
DESCRIBE CAROLEUM & LIQUID	POWDER SINGLE PHASED VOLUME 100 %					
H;	3-1.4 FLASH - 70°F - 200°F					
☐ 2-4 ☐ 10.1-12.5 ☐ GRAVITY 反 8-1.0 ☐ 1.5	5-1.7 POINT 70°F - 100°F NO FLASH OPEN CUP					
4.1-6.9 > 12.5 1.1-1.2 >	1.7					
X 7 □ EXACT □ EXACT □	140°F-200°F					
100	D METALS TOTAL (PPM) EPA EXTRACTION PROCEDURE (mg/L)					
LUBRICATION OIL 100 %	ARSENIC (As) L					
	BARIUM (Ba) L					
	CADMIUM (Cd) COPPER (Cu)					

	ELEAD (Pb) L					
	CHROMIUM-HEX (Cr + 6) E OTHER COMPONENTS - TOTAL (PPM)					
	CYANIDES LANGE PCB'S					
· · · · · · · · · · · · · · · · · · ·	SULFIDES					
SHIPPING INFORMATION	A HAZARDOUS CHARACTERISTICS					
.O.T. HAZARDOUS MATERIAL? YES AND	REACTIVITY NONE PYROPHORIC SHOCK SENSITIVE					
EDPER SHIPPING NAMEL WASTE OIL N.O.S.	EXPLOSIVE WATER REACTIVE OTHER					
ZARD CLASS 1 10. NO. WY 10 RO. WANT	OTHER HAZARDOUS CHARACTERISTICS:					
ETHOD OF SHIPMENT: BULK LIQUID BULK SOLID SHONE RADIOACTIVE ETIOLOG						
DRUM (TYPE/SIZE) 176/556AL PESTICIDE MANUFACTURING WASTE OTHER						
NTICIPATED VOLUME: L	USEPA HAZARDOUS WASTE? YES X NO					
CTHER L USEPA HAZARDOUS CODE(S) L L L L L L L L L L L L L L L L L L L						
PER: U ONE TIME U WEEK U MONTH	STATE HAZARDOUS WASTE? YES NO					
UQUARTER X YEAR U						
SPECIAL HANDLING INFORMATION						
ADDITIONAL PAGE(S) ATTACHED						
HEREBY CERTIFY THAT ALL INFORMATION SUBMITTED IN THIS AND ALL ATTACHED USPECTED HAZARDS HAVE BEEN DISCLOSED.						
JTHORIZED SIGNATURE TITLI						
loken to be hell II	access Enc. 8/7/84					
(



Chemical Waste Management

Of Massachusetts, Inc.

Five Strathmore Road Natick, MA 01760 617/431-7942 617/655-8863

February 23, 1984

Emerson+Cuming, W.R. Grace Co. 59 Walpole St. Canton Ma 02021 Attn; Jay McNeff

Dear Jay McNeff,

In Compliance with Section 310 CMR 30.512 of the Commonwealth of Massachusetts Hazardous Waste Regulations, this letter will serve to inform you that Chemical Waste Management of Massachusetts, Inc. has all the appropriate permits and licenses for, and will accept those wastes specified on Generators Waste Material Profile Sheets with the codes listed below.

Please note that should you desire to ship materials types other than those covered by the codes listed, a Generators Waste Material Profile Sheet must be completed for each material and submitted for acceptance. If acceptable it will be added to the list and a new letter will be sent to you prior to shipment of the material.

Very truly yours,

P. F. Russo

General Manager

Approved Codes:

NAT D82555 Potassium Oxalate

NAT D82558 Iron Oxide Pigment

NAT D82559 Spent Boric Acid

NAT D82560 Sodium Alkyl Sulfate

NAT D82561 Spent Diammonium Phosphate

NAT D82563 Titanium Dioxide

NAT D82564 Diglycidyl Ether

NAT D82565 Pliobond Adhesive

NAT D82566 Waste Polychlorinated Eiphenyls

NAT D82567 Tertbutystyrene + Sand



Chemical Waste Management, Inc.

Five Strathmore Road Natick, MA 01760 617,655-8863 617/431-7942

October 28,1983

Emerson + Cuming 59 Walpole St. Canton, Ma 02021

Dear Paul Firestone

In Compliance with Section 310 CMR 30.512 of the Commonwealth of Massachusetts Hazardous Waste Regulations, this letter will serve to inform you that Chemical Waste Management of Massachusetts, Inc. has all the appropriate permits and licenses for, and will accept those wastes specified on Generators Waste Material Profile Sheets with the codes listed below.

Please note that should you desire to ship materials types other than those covered by the codes listed, a Generators Waste Material Profile Sheet must be completed for each material and submitted for acceptance. If acceptable it will be added to the list and a new letter will be sent to you prior to shipment of the material.

Very truly yours,

P. F. Russo

General Manager

Approved Codes:

NAT B02697 Styrene Monomer(Inhibited)

NAT A68803 Dodecenyl Succinil Anhydride And Water

√ NAT B02691 Carbon Sludge

5 NAT B02692 Waste 011

NAT B02690 Carbon Solution

6 NAT B02693 Paint Sludge (Absorber)

METHYLENE CHLORIDE

7 NAT B02694 Resin Powder

302640

THIS FORM HAS BEEN DEVELOPED BY AND FOR THE USE OF CHEMICAL WASTE MANAGEMENT, INC. AND OTHER WASTE MANAGEMENT, INC. COMPANIES.

	SALES	CODE
1	NAT	B 02692
	WASTE P	ROFILE SHEET CODE



GENERATOR'S WASTE MATERIAL PROFILE SHEET

GENERAL DIRECTIONS: In order for us to determine whether we can lawfully, safely and environmentally transport, store, treat or dispose of your waste stream, we must ask certain information about your waste. All of the information we seek is necessary, for our purposes and yours. Be complete in your answers: if your response is "none," so indicate. Answers must be in ink or typewritten. Information you provide will be maintained in strictest confidence. Please make a copy of this form for your records, returning the original to the location indicated below.

THI	S FORM AND ANY SUPPLEMENTAL INFORMATION SHOULD BE RETURNED TO:
	5 STRATHMORE RD.
	NATICK, MA 01760
1.	GENERATOR NAME: FRERSON + CUMING
2.	GENERATING FACILITY NAME/ADDRESS/USEPA FACILITY I.D. NUMBER (IF ANY):
	EMERSON + CUMING 59 WALPOLE ST. CANTON, MA 02021
	MAD 000 361 709
3.	COMPANY CONTACTS:
	GENERAL PAUL FIRESTONE TITLE TRAFFIC MER PHONE 828-3300
	TECHNICAL TAY MOVERS TITLE PLANT ENG. PHONE \$28-3300
	TECHNICAL JAY MONEER TITLE PLANT ENG. PHONE 828-3300
,	TITLE PHONE
	WASTE NAME: WASTE OIL
5.	PROCESS GENERATING WASTE: PUMP LUBRICATION
	POWDER [] OTHER: C. SOLIDS: TOTAL (%): TOTAL DISSOLVED (ppm or %):
	D. SPECIFIC WEIGHT (AS # PER UNIT):
	E. pH: (Show the following as range of %)
	AS: H ₂ SO ₄ % H ₂ PO ₄ %
	HC1% NaOH%
	HF% NH ₄ OH%
	HNO,% Ca(OH),%
	OTHER:%%
	D16 *
	F. FLASH POINT: 315 (CLOSED CUP TEST ONLY)
	G. VAPOR PRESSURE (in mm of Hg at 25°C):
•	H. BTU PER #: ASH CONTENT %
	I. CHARACTERISTIC COLOR DISTINCTIVE ODOR
	J. HALOGENATED? % SULFONATED? %
	K. ALPHA RADIATION AS pCi/l:

				
		(ATTACH ADDITIONAL PA	AGES IF NECESSARY)	
	DOES THIS WASTE CONT. OTHER ORGANIC COMP	AIN ENDRIN, LINDANE, MET DUNDS LISTED BY USEPA A	HOXYCHLOR, TOXAPHENE IT 40 CFR 261.24? _ <i>NO</i>	, 2,4-D, 2,4,5-TP SILVEX, OR A _ IF SO, PLEASE NOTE ABO
).	HEAVY METALS (WITH pp	m RANGES):		
	TOTAL	TOTAL LEACHABLE	TOTAL	TOTAL LEACHABLE
	Ag		Hg	<u> </u>
	As		Ni	
	Ba		Pb	
	Cd		Se	
	Cr		Zn	
	Cu		Other (ATTACH ADDIT	TIONAL PAGES)
	(IF YOU HAVE DETERMI) 40 CFR, PART 261, APPE	NED TOTAL LEACHABLES (NDIX II — SO INDICATE B	JSING USEPA'S "EP TOXIC Y MARKING "EP" AFTER 1	CITY TEST PROCEDURE" THE RESULT SHOWN ABOVE
3.	INORGANIC COMPONEN	ITS (WITH % RANGES):	OTHER	
	TOTAL CYANIDE	%		
	FREE CYANIDE	%	·	
	SULFIDE AS:	% ·		
	BISULFITE AS:	%		
	SULFITE AS:	- %		
		(ATTACH ADDITIONAL P	AGES IF NECESSARY)	
D.		EAM CONTAIN BIOLOGIC M I ADDITIONAL PAGES DESC		·
E.	IS THE WASTE A PESTIC	CIDE OR PRODUCED BY A P IER IT CONTAINS:	ESTICIDE MANUFACTURIN	G PROCESS?
	□ ORG#	NOPHOSPHATES - CONTA	AINING SULFUR	□ NO
	CARB	AMATES		
	☐ CHLO	RINATED HYDROCARBONS	.	
	ZADDOLIS COMPONENTS	S AND CHARACTERISTICS		
4		ES (INSERT NUMBER CODE	S PER INSTRUCTIONS ON	I AST DAGE)
	(1) TOXICITY RATING:	4	RMAL L ORAL 2	LAST FAGE)
	(I) TOXION I NAME.	MINCATION DE	Flammability	
			rugini a Dility	
	(2) HAZARD IDENTIFIC	ATION SYSTEM	D. Banathultu	
	(2) HAZARD IDENTIFIC	CATION SYSTEM: Heal	in Reactivity	
	(2) HAZARD IDENTIFIC	:ATION SYSTEM: Heal		
A.			Special Instructions	EGED TO BE ASSOCIATED W

9.	REC	BULATORY CLASSIFICATION OF WASTE
	A.	IS THIS WASTE A "HAZARDOUS MATERIAL" AS DEFINED BY REGULATIONS OF THE U.S. DEPARTMENT OF TRANSPORTATION PURSUANT TO THE HAZARDOUS MATERIALS TRANSPORTATION ACT? (SEE 49 CFR 172.101 AND 173 FOR "HAZARDOUS MATERIALS" LIST AND CHARACTERISTICS.) IF SO, PLEASE
•		ADVISE OF THE FOLLOWING:
		(1) CORRECT SHIPPING DESCRIPTION: WASTE OIL MO.S. (WIGHLANT)
		(2) HAZARD CLASS(ES): TICH TO THE TOTAL THE TICH TO TH
		(3) MATERIAL I.D. NO.(S) WID 10
	B.	DOES THIS WASTE CONTAIN ANY "HAZARDOUS SUBSTANCE" AS DEFINED BY REGULATIONS OF THE U.S. ENVIRONMENTAL PROTECTION AGENCY PURSUANT TO SECTION 311 OF THE CLEAN WATER ACT?
		(1) THE NAMES OF EACH HAZARDOUS SUBSTANCE PRESENT IN THE WASTE, THE HAZARD CATEGORY (X, A, B, C OR D) AND THE APPROXIMATE CONCENTRATION OF THE SUBSTANCE BY WEIGHT IN THE WASTE:
		(ATTACH ADDITIONAL PAGES IF NECESSARY)
	C	IS THIS WASTE A "HAZARDOUS WASTE" AS DEFINED BY REGULATIONS OF THE U.S. ENVIRONMENTAL
	O.	PROTECTION AGENCY PURSUANT TO SECTION 3001 OF THE RESOURCE CONSERVATION AND RECOVERY ACT? (SEE 40 CFR, PART 261 FOR WHAT IS A "HAZARDOUS WASTE.") IF SO, STATE:
		(1) THE USEPA HAZARDOUS WASTE NUMBER(S):
		(2) DO YOU CLAIM TO BE A SMALL QUANTITY GENERATOR? (SEE 40 CFR 261.5.)
.	D.	IS THIS WASTE A "HAZARDOUS WASTE" AS DEFINED BY THE ENVIRONMENTAL REGULATORY AGENCY IN YOUR STATE? IF SO, STATE WHY IT IS SO DEFINED AND ANY STATE HAZARDOUS WASTE CODE NUMBERS ASSIGNED:
	M	THE INFORMATION PROVIDED IN SECTIONS 6-9 BASED UPON LABORATORY ANALYSIS OF THE WASTE ATERIAL? IF SO, PLEASE ADVISE OF THE DATE OF THE MOST RECENT ANALYSIS:
11.		AVE YOU OBTAINED TOXICITY STUDIES OF THIS WASTE STREAM? IF SO, PLEASE ATTACH A COPY OF HE RESULTS.
12.	_	JANTITY/SHIPPING REQUIREMENTS:
	Al	NTICIPATED VOLUME IS:
	G	ALLONS [] TONS [] CUBIC YARDS [] DRUMS (X OTHER []
		RANSPORTATION EQUIPMENT REQUIRED:
	 SI	ERVICE/SCHEDULING REQUIREMENTS:
	_	
		DRIZED SIGNATORY: John J. The Ref II TITLE PLANT EVG. DATE 10/19/8
		DENTIALITY AGREEMENT:,
Pho	ch in	deration for the Generator's release of the above information, and any other supplemental data provided, agrees to treat formation as confidential property and will not disclose such information to others except as is required by law, and in roumstances only after first giving notice to the Generator.
		By: JAY MENET
		By: Name PLANT ENGINEEIZ Title



Chemical Waste Management of Massachusetts, Inc. 5 Strathmore Rd. Natick, MA 01760 617/431-7942 617/655-8863

INDICATED BY CHECKMARK, THE HAZARDOUS ITEMS OR CONDITIONS LISTED BELOW PRESENT IN YOUR CHEMICAL WASTE. PLEASE QUANTIFY EACH ITEM INDICATING WHETHER PRESENT IN ppm,, gms/liter, oz/gallons, % etc. A GIVEN RANGE OR QUANTITY ESTIMATE IS ACCEPTABLE

Mercury	Cancer Suspect Agents			
Chromium	Highly reactive materials			
Cadmium	E.G. Sodium metal			
Lead	Magnesium Metal Organosilanes			
Zinc	Benzoyl Peroxide			
Arsenic	Pesticides/Herbicides			
Antimony	Radioactive Materials			
Beryllium	Polychlorinated biphenyls or PCB's			
Selenium	Polybrominated biphenyls			
Silver	or PBB's			
Barium	Cyanides			
CONDITIONS:				
Air Reactive	Water Reactive			
CAPABLE OF RAPID POLYMERIZATION	N, DECOMPOSITION, OR OTHER REACTION			
e.g. Monomers capable of se or transportation temp	vere polymerization at any possible storage eratures.			
SHOCK SENSITIVE				
e.g. Materials capable of se transport conditions.	vere reaction under normal handling and			
NONE OF THE ABOVE ITEMS OR CON	DITIONS ARE PRESENT			



Waste Management, Inc. GENERATOR'S WASTE MATERIAL PROFILE SHEET WASTE PHOFILE SHEET CODE TSOR D 82566



		7.046	25 T 2 T 2					
A GENERAL INFORM	MOTAN			;				
NERATOR NAME: L		<u> </u>	ري ري ه	٠. <u>.</u> .	· prod	. : 	TRANSPORTER:	Some sailed man begin
FACILITY ADDRESS:		· 4/	1 4 1				TRANSPORTER PHONE: L	Marie and State of the Control of th
L			, 4.77	<u></u>	3.7		GENERATOR USEPA I.D.	$-\mathcal{M}_{A}$
L							GENERATOR STATE I.D.	
TECHNICAL CONTACT:	· V		19.07/s		<u>_</u>	E Lienia	The War sally	_ PHONE: (11 535 334.)
NAME OF WASTE: L	<u> </u>	11:01	- 1 4				MARKS	
PROCESS GENERATING	G WASTE: L_	<u>्र</u> ्र	<u> </u>			nite de	<u></u>	
B PHYSICAL CHARA	CTERISTICS OF	F WASTE						
COLOR		ODOR 🖺	NONE [MILD P	PHYSICAL STA	ATE @ 70°F	LAYERS	FREE LIQUIDS
*	1		STRONG) ,	SOLID	SEMI-SOLI		Ď YES □ NO
	_	DESCRIBE L			Liquib	POWDER	SINGLE PHASED	VOLUME L%J
pH: □<2 [7.1-10	□ N/A]< .8	1.3-	1,		> 200°F CLOSED CUP
	10.1 - 12.5		GRAVITY	.8 - 1.0	1.5-1	POINT	_	NO FLASH OPEN CUP
4.1-6.9	> 12.5	1] 1.1 - 1.2		7	☐ 101 °F · 139 °F	EXACT
[] 7 [EXACT L	اا		EXACT _	1.43		140°F-200°F	-
C CHEMICAL COMP	OSITION (TOTAL	ALS MUST ADI			111/1/2	D METALS ARSENIC (As)	TOTAL (PPM)	EPA EXTRACTION PROCEDURE (mg/L) SELENIUM (Se)
						BARIUM (Ba)		SILVER (Ag)
	·					CADMIUM (Cd)	L	COPPER (Cu)
						CHROMIUM (Cr)) ————	NICKEL (NI)
						MERCURY (Hg)	No.	/\) = zinc (zn)
					~~~~~*	LEAD (Pb)		THALLIUM (TI)
<b>L</b>					~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	CHROMIUM-HED		
L	<del></del>		<del></del>				MPONENTS - TOTAL (PPM)	<b>&gt;5</b> 000 (197
						CYANIDES L	$\mathcal{O}$	PCB'S
F SHIPPING INFORM	MATION				=	O HAZARDOU	S CHARACTERISTICS	T Harton
D.O.T. HAZARDOUS M.	_	Ď YES	□ NO		7	REACTIVITY:	NONE D PYROP	PHORIC SHOCK SENSITIVE
PROPER SHIPPING NA	J. July		en in the	<u>. د د ، .</u>	1 20			R REACTIVE OTHER
HAZARD CLASS	274 1	I.D. NC	0.	- R.O. I	10/4.54	OTHER HAZARE	DOUS CHARACTERISTICS:	
METHOD OF SHIPMEN	NT: BULK	1.1A	110000 -	BULK SO	••	NONE	☐ RADIO	ACTIVE ETIOLOGICAL
	2.2	(TYPE/SIZE)	2100	1. 1.	· //·~	PESTICIDE	MANUFACTURING WASTE	E OTHER
ANTICIPATED VOLUM	E:	GA	ALS. L	CUF	BIC YARDS	USEPA HAZARD	OUS WASTE?	res DNO
	<u></u>		THER (			USEPA HAZ	ARDOUS CODE(S)	<del>=</del>
PER:	ONE TIME	_	] WEEK	☐ MON	ITH .	STATE HAZARD	Mana	res 🗌 no
	QUARTER	· L	YEAR			STATE CODE	E(S) 1902	10.
H SPECIAL HANDLI	NG INFORMATION	ON						
								ADDITIONAL PAGE(S) ATTACHED
I HEREBY CERTIFY TO SUSPECTED HAZARDS AUTHORIZED SIGNATION	IS HAVE BEFN I	RMATION SUB DISCLOSED.	IMITTED IN THIS	AND ALL	ATTACHED D	DOCUMENTS IS C	COMPLETE AND ACCURATE	E, AND THAT ALL KNOWN OR



# Ryan Barrel Co., Inc.

RECONDITIONERS - DEALERS IN ALL TYPES OF STEEL CONTAINERS SPECIALIZING IN

OPEN HEAD CONTAINERS FEATURING CHEMICAL-BOLVENT PROUP-BAKED-ON LININGS 56 PULASKI STREET, P.O. BOX 589, PEABODY, MASS. 01960 NORTH SHORE AREA CALL 532-1130 — BOSTON AREA CALL 322-9110

"SERVING INDUSTRY FOR OVER HALF A CENTURY"

December 29, 1986

Emerson & Cuming 869 Washington Street Canton, Massachusetts 02021

Attention: Ann Fish

Dear Mrs. Fish:

Please be advised that the price of removing your scrap drums will be increased to \$6.00 (six dollars) each, effective January 1, 1987.

We regret this course of action, but find it is necessary if we are to remain viable in keeping your premises clean within existing DEQE guidelines.

Thanking you for the opportunity to be of service to you we remain.

Veryttruly yours,

Harvey Aronson, Sales Ryan Barrel Co., Inc.

HA/jrc



RECONDITIONERS DEALERS IN ALL TYPES OF STEEL CONTAINERS

OPEN HEAD CONTAINERS FEATURING CHEMICAL-BOLVENT PROOF-BAKED-ON

# Ryan Barrel Co., Inc.

56 PULASKI STREET, P.O. BOX 589, PEABODY, MASS. 01960
NORTH SHORE AREA CALL 532-1130 - BOSTON AREA CALL 322-9110

"SERVING INDUSTRY FOR OVER HALF A CENTURY"

### SUBJECT ENVIRONMENTAL MANAGEMENT

At a recent meeting of NABADA dealers, the board discussed at length the pressures being placed upon drum dealers by certain attitude changes taking place in drum emptying companies. Basically, strict environmental regulation and expanded standards of liability are causing most companies to take far more interest in the ultimate destination of their empty containers. This interest includes, in most cases, considerable concern over drum plant processing operations and their environmental management. Many emptiers now want assurances that their containers whether processed for recycling or re-use-are being handled in strict compliance with all current environmental laws.

As a result. some emptiers have expressed a desire to work directly with the reconditioning plants processing their drums, bypassing the services of a drum dealer. In addition to this problem, it appears some dealers are especially troubled by certain NABADA initiatives and compliance programs which do. indeed, encourage drum emptiers to pay more attention to the downstream disposition of their empty containers. While the appears little doubt that these NABADA programs are of great value to the used steed drum industry and are here to stay, care must be taken to ensure that no needless burdens are placed on drum dealers. Drum dealers perform a variety of valuable functions in many commercial situations and they would not succeed were there not a need for their respective services.

The immediate agreement reached is to be sure that statement when referring to the process of shipments of empty drums to processing plants-use references such as "drums destined for reconditioning", instead of "drums sent to a reconditioner's plant."

It was pointed out, however, that changing environmental rule of today's industrial packaging scenes require drum dealers to take a long, hard look at their methods of doing business. Satisfying drum emptiers who have new, justified concerns about proper disposition of their empty containers may require some additional assurances, more expensive documentation, and some new dealer strategies. Clearly, the days of drum trucks going into plants, picking up a load of drums, and driving off into the sunset(with the emptiers having absolutely no idea where theses drums will end up) is coming to a rapid close. With adjustments to the new requirements of doing business in an environmentally sensitive age, dealers certainly can continue performing their uniques services in the drum industry.

page 2
Lawrence W. Bierlein, P.C.
"Emptiers' Liability; Superfund"

The drum emptier who arranges for the discard of uncleaned drums at any site from which there is a release of a hazardous substance can be held liable for all clean-up costs and for any damage to the natural environment caused by that release. There is no time limit on this liability. There are virtually no defenses, other than acts of God or war. The emptier cannot escape liability by causing title to the drums to pass to the scrap dealer or the landfill or disposal site operator. In short, a discarded dirty drum is a perpetual liability for the emptier.

This major new liability under Superfund, when contrasted with the emptiers' substantially lessened liability when the drums have been cleaned, properly reconditioned, and reused, should encourage every emptier to seek responsible reconditioning rather than disposal.

While theoretically there may be some product liability involving the drum as long as it exists, this exposure is greatly lessened for the emptier after reconditioning, especially with reference to waste, residue, etc., whereas he has a permanent exposure to liability under environmental laws for discarded raw drums containing waste and residue.

Please let me know if you have any questions on my interpretation of these liability laws.

Very truly yours,
Lawrence W. Bierlein

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Lawrence W. Bierlein, P.C. Law Offices 910 Seventeenth Street, N.W. Washington, D.C. 20006 (202) 659-9475

June 21, 1982



# Ryan Barrel Co., Inc.

RECONDITIONERS - DEALERS IN ALL TYPES OF STEEL CONTAINERS SPECIALIZING IN OPEN HEAD CONTAINERS FEATURING

CHEMICAL-BOLVENT PROOF-BAKED-ON

NORTH SHORE AREA CALL 532-1130 - BOSTON AREA CALL 322-9110

"SERVING INDUSTRY FOR OVER HALF A CENTURY"

56 PULASKI STREET (WATERS RIVER PLANT) PEABODY, MASS. 01960

To: NABADA Members

Re: "Emptiers' Liability; Superfund"

Lawrence W. Bierlein, P.C.

Law Offices, Washington, D.C.

As you know, liability is a major factor in decisions made by business today. I recently heard of a large firm which is discarding its emptied drums rather than having them reconditioned, because of its concern with liability.

I believe this emptier's concerns are misplaced. Liability, in fact, encourages effective reconditioning and reuse of drums, not the discard of them. That is the message in the title of EPA's hazardous waste law -- the Resource Conservation and Recovery Act.

An emptier whose drums are handled by a competent reconditioner is assured of several things, each of which can lessen his liability:

- (1) The drum is cleaned, and the long-term threat of public exposure to the raw drum in a landfill or elsewhere is eliminated.
- (2) The drum is marked by the reconditioner indicating that it has been properly reconditioned, and this mark serves as a certification which may result in the reconditioner sharing any liability involving the drum.
- (3) The residue removed from the drum is handled properly by a known party -- the reconditioner.

Under the Comprehensive Environmental Response, Compensation and Liability Act (Superfund), P.L. 96-510, 42 U.S.C. 9601, 9607, substantial new liability is imposed on any party dealing with "hazardous substances." These substances are defined to include hazardous wastes. Out of concern for the environment, and particularly with regard to past waste disposal practices, the government created a massive and absolute liability for any person who arranges for disposal of a hazardous substance at any site from which there is an actual or threatened release of a hazardous substance that damages the environment, or that incurs response costs. Being careful is no defense. One can be held liable for all costs of removal, response, or remedial action and for all damage to natural resources caused by the release of hazardous substances from that site.

### REUSE OF CONTAINERS, RECONDITIONING OF STEEL DRUMS, CONVERSION OF STEEL DRUMS, AND EMPTY PACKAGINGS (Continued)

§ 173.29 Empty packagings, portable tanks, cargo tanks, and tank cars: (a) Empty cylinders, barrels, kegs, drums, or other containers except carboys (see paragraph (b) of this section) previously used for the shipment of any hazardous materials, as defined in this part, if authorized for reuse must have all-openings including removable heads, and filling and vent holes, tightly closed before being offered for transportation. Small quantities of the material with which containers were loaded may remain in "empty" containers: When the vapors remaining therein are unstable, it is permissible to add sufficient inert gas to render the vapors stable. They may be loaded in open or stock cars when desired. Cars should not be placarded but lighted open-flame lanterns or other open-flame lights should be kept away.

(d) Any packaging or accessory which has been used for a shipment of radioactive materials and which contains residual internal radioactive contamination, when shipped as empty, must be securely closed. The external surface must be tree of significant removable radioactive contamination as provided in §173.397(a). The radiation at the external surface of the packaging must not exceed 0.5 millirem per hour. The "Empty" label, described in §172.450, must be affixed to the

packaging

(e) Unless otherwise specifically provided, any empty packaging offered for transportation (see paragraph (a) of this section) bearing labels described in §§ 172.411 through 172.446 (except § 172.450 of this subchapter) must have these labels removed, obliterated, or completely covered. The label described in § 172.450 is authorized for the latter purpose. Each packaging which last contained explosives and on which the word "EXPLOSIVES" or the shipping name is printed, stenciled, or otherwise marked or applied, when shipped as empty, must have this marking completely covered or obliterated if shipped in less-than-carload or less-than-truckload lots, or on open-top or flat cars or on open-top or flat bed motor vehicles or trailers. Covering or obliteration of these labels and markings is not required for carload or truckload shipments made in closed cars or van-type motor vehicles when loaded by the shipper and unloaded by the consignee or their authorized agents.

(6) Parts 270 and 124 of this chapter, ith respect to storage facilities.

i5 FR 33119, May 19, 1980, as amended at 5 FR 44973, Sept. 8, 1981; 48 FR 2532, Jan. 0, 1983; 48 FR 14294, Apr. 1, 1983]

# 261.7 Residues of hazardous waste in empty containers.

(a)(1) Any hazardous waste remaining in either (i) an empty container or ii) an inner liner removed from an empty container, as defined in paragraph (b) of this section, is not subject to regulation under Parts 261 through 265, or Part 270 or 124 of this chapter or to the notification requirements of Section 3010 of RCRA.

(2) Any hazardous waste in either (i) a container that is not empty or (ii) an inner liner removed from a container that is not empty, as defined in paragraph (b) of this section, is subject to regulation under Parts 261 through 265, and Parts 270 and 124 of this chapter and to the notification requirements of Section 3010 of RCRA.

(b)(1) A container or an inner liner removed from a container that has held any hazardous waste, except a waste that is a compressed gas or that is identified in § 261.33(c) of this chapter, is empty if:

(i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, and

(ii) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container or inner liner, or

(iii)(A) No more than 3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 110 gallons in size, or

(B) No more than 0.3 percent by weight of the total capacity of the container remains in the container or inner liner if the container is greater than 110 gallons in size.

(2) A container that has held a hazardous waste that is a compressed gas is empty when the pressure in the con-

- a hazardous waste identified in § 261.33(c) of this chapter is empty if:
- (i) the container or inner liner has been triple rinsed using a solvent capable of removing the commercial chemical product or manufacturing chemical intermediate;
- (ii) the container or inner liner has been cleaned by another method that has been shown in the scientific literature, or by tests conducted by the generator, to achieve equivalent removal;

(iii) in the case of a container, the inner liner that prevented contact of the commercial chemical product or manufacturing chemical intermediate with the container, has been removed.

[45 FR 78529, Nov. 25, 1980, as amended at 47 FR 36097, Aug. 18, 1982; 48 FR 14294, Apr. 1, 1983]

### Subpart B—Criteria for Identifying the Characteristics of Hazardous Waste and for Listing Hazardous Waste

# \$ 261.10 Criteria for identifying the characteristics of hazardous waste.

(a) The Administrator shall identify and define a characteristic of hazardous waste in Subpart C only upon determining that:

(1) A solid waste that exhibits the characteristic may:

(i) Cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or

(ii) Pose a substantial present or potential hazard to human health or the environment when it is improperly treated, stored, transported, disposed of or otherwise managed; and

(2) The characteristic can be:

(i) Measured by an available standardized test method which is reasonably within the capability of generators of solid waste or private sector laboratories that are available to serve generators of solid waste; or

(ii) Reasonably detected by generators of solid waste through their \$ 261.11 Criteria for listing hazardous

(a) The Administrator shall list a solid waste as a hazardous waste only upon determining that the solid waste meets one of the following criteria:

(1) It exhibits any of the characteristics of hazardous waste identified in Subpart C.

(2) It has been found to be fatal to humans in low doses or, in the absence of data on human toxicity, it has been shown in studies to have an oral LD 50 toxicity (rat) of less than 50 milligrams per kilogram, an inhalation LC 50 toxicity (rat) of less than 2 milligrams per liter, or a dermal LD 50 toxicity (rabbit) of less than 200 milligrams per kilogram or is otherwise capable of causing or significantly contributing to an increase in serious irreversible, or incapacitating reversible, iliness. (Waste listed in accordance with these criteria will be designated Acute Hazardous Waste.)

(3) It contains any of the toxic constituents listed in Appendix VIII unless, after considering any of the following factors, the Administrator concludes that the waste is not capable of posing a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported or disposed of, or otherwise managed:

(i) The nature of the toxicity presented by the constituent.

(ii) The concentration of the constituent in the waste.

(iii) The potential of the consituent or any toxic degradation product of the constituent to migrate from the waste into the environment under the types of improper management considered in paragraph (a)(3)(vii) of this section.

(iv) The persistence of the constituent or any toxic degradation product of the constituent.

(v) The potential for the constituent or any toxic degradation product of the constituent to degrade into nonharmful constituents and the rate of degradation.

(vi) The degree to which the constituent or any degradation product of the constituent bloaccumulates in eco(vii) The plausible types of improper management to which the waste could be subjected.

(viii) The quantities of the waste generated at individual generation sites or on a regional or national basis.

(ix) The nature and severity of the human health and environmental damage that has occurred as a result of the improper management of wastes containing the constituent.

(x) Action taken by other governmental agencies or regulatory programs based on the health or environmental hazard posed by the waste or waste constituent.

(xi) Such other factors as may be appropriate.

Substances will be listed on Appendix VIII only if they have been shown in scientific studies to have toxic, carcinogenic, mutagenic or teratogenic effects on humans or other life forms.

(Wastes listed in accordance with these criteria will be designated Toxic wastes.)

(b) The Administrator may list classes or types of solid waste as hazardous waste if he has reason to believe that individual wastes, within the class or type of waste, typically or frequently are hazardous under the definition of hazardous waste found in Section 1004(5) of the Act.

(c) The Administrator will use the criteria for listing specified in this section to establish the exclusion limits referred to in § 261.5(c).

## Subpart C—Characteristic. of Hazardous Waste

8 261.20 General.

(a) A solid waste, as defined in § 261.2, which is not excluded from regulation as a hazardous waste under § 261.4(b), is a hazardous waste if it exhibits any of the characteristics identified in this Subpart.

[Comment: §:262.11 of this chapter sets forth the generator's responsibility to determine whether his waste exhibits one or more of the characteristics identified in this Subpart]

(b) A hazardous waste which is identified by a characteristic in this subpart, but is not listed as a hazardous



RECONDITIONERS - DEALERS IN ALL TYPES OF STEEL CONTAINERS SPECIALIZING IN

OPEN HEAD CONTAINERS FEATURING CHEMICAL-SOLVENT PROOF-BAKED-DH LININGS

# Ryan Barrel Co., Inc.

56 PULASKI STREET, P.O. BOX 589, PEABODY, MASS. 01960
NORTH SHORE AREA CALL 532-1430 — BOSTON AREA CALL 322-9110

"SERVING INDUSTRY FOR OVER HALF A CENTURY!

EMPTY DRUM CERTIFICATION

I brobe certify that these drums are "empty" as that term is defined in the national Environmental Protection Agency regulations, 40°CFk 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49°CFR 173.29.**

Date:	3/4/87		ic number:	2/9/3	
	Name: Emersor			1 0 1	
*Wi	th regard to mo	st regulated :			

- (i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that
  - (ii) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container..."

type of container, e.g., pouring, pumping, and aspirating, and

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EPA says the container is empty only "if the container... has been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

**DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.



RECONDITIONERS - DEALERS IN ALL TYPES OF STEEL CONTAINERS. SPECIALIZING IN

OPEN HEAD CONTAINERS FEATURING -CHEMICAL-SOLVENT PROOF GAKED ON LIMINGS

# Ryan Barrel Co., Inc.

56 PULASKI STREET, P.O. BOX 589, PEABODY, MASS 01960 NORTH SHORE AREA CALL 532 1330 - BOSTON AREA CALL 322-9110

"SERVING INDUSTRY FOR OVER TEXLE A CENTURY""

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defined in the national Unvironmental Protection Agency regulations, 40 CFR 20149*, and that they have been properly prepared for transportation index the regulations of the U.S. Department of Transportation, 43 CFR 173.25.**

Company Name: Emerson Cuming Signed By

*With regard to most regulated residues, EPA's 40 CFR 261.7 says: "A container...is empty if:

- (i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, gumping, and aspirating, and
- (ii) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container..."

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REC'D BY



RECONDITIONERS - DEALERS IN ALL TYPES OF STEEL CONTAINERS SPECIALIZING IN

OPEN HEAD CONTAINERS FEATURING CHEMICAL-BOLVENT PROOF-BAKED-ON

# Ryan Barrel Co., Inc.

56 PULASKI STREET, P.O. BOX 589, PEABODY, MASS. 01960 NORTH SHORE AREA CALL 532-1130 - BOSTON AREA CALL 322-9110

"SERVING INDUSTRY FOR OVER HALF A CENTURY"

March 16, 1987

Emerson-Cumings Co., 59 Walpole St., Canton, Mass., 02021

Att: Mr. Randy Olson:

Dear Mr. Olson:

Enclosed please find all literature you requested relative to the disposition of the empty drums from your plant.

Most of it is self-explanatory, and some of it is recent literature recently released by our office. If there is anything else you might need along these lines, please do not hesitate to contact us.

Thanking you for the opportunity to be of service to you, we remain

Very truly yours

RYAN BARREL CO., INC.

Harvey Aronson, Sales

Vanuy Chronson

# EMERSON & CUMING

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> Ryan Barrel Co. 56 Pulaski St. Peabody, Mo. **21760**

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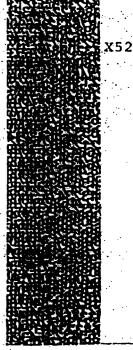
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2/26/87

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Removal of Empty Barrels



· Emercor & Ourring, Inc. ·

A GRACE

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Emerson & Cuming, Inc.

Ryan Barrel Co. 56 Pulaski St. Peabody, Ma. 01760 PUPCHASE ORDER NO BIM

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Emerson & Cuming, Inc. A **GRACE** Co.

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### COMPANY CONFIDENTIAL

# **GRACE** MEMO

no: M. Stole

dote: March 18, 1987

from:

R. M. Olson

subject:

EMPTY DRUMS - RYAN

Attached is the initial response requested from

Ryan Barrel.

R. M. Olson

RMO/dd attachment



North East Solvents Reclamation Corp. 221 SUTTON STREET NO. ANDOVER, MASS. 01845 TEL (617) 683-1002

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NO.

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Receson & Curing 59 Walpole St. Canton, 11A 02021

Attn: Accounts Asyable

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### PROCESS DESCRIPTION

The primary process is molding of large marine riser modules. The modules are typically 15 ft. long and 4 ft. diameter. The modules consist of epoxy filled with glass microballoons. This is done utilizing steel molds to define the shape of the part. The epoxy resin and epoxy hardener are mixed together with the glass microballoon powder and injected into the mold. The mold is then placed into an oven to cure the epoxy. After curing, the mold is opened and the module is removed. The molded part is then finished by patching and painting the surfaces.

Other parts are molded to various sizes and shapes utilizing different types of epoxy resins and hardener. Some include glass microballoons whereas others may include fiberglass reinforcement. These items essentially follow the same process of: mixing the ingredients, filling the mold, oven curing and finishing.

rodate-looks tobe 1987 time frame

### BACKGROUND OF "BERMED AREA IN YARD"

In November 1982, an investigation of this site was initiated with the DEQE and the Canton Board of Health. This investigation was prompted by an observation of the raceway discharge pipe sticking out of the ground behind the plant. Emerson & Cuming then retained Camp Dresser & McKee, Inc. to make a complete investigation and audit of this site. This program started in November 1982 and was finalized and completed in March 1985. The result of the joint program by the DEQE, Canton Board of Health, Camp Dresser & McKee, and Emerson and Cuming was complete satisfaction to the DEQE and Canton Board of Health. Various reports and correspondence of this program are on file with the Canton Board of Health and the Massachusetts DEQE.

One aspect of this program was a request by the DEQE and the Canton Board of Health to install a berm around a section of the yard area where drummed chemicals were stored at that time. The berm was then installed, as requested, in mid 1983. To the best of our knowledge a building permit was obtained by the contractor for this work.

Following the installation of the berm, Emerson & Cuming followed a program to discontinue drum storage of materials in the yard area. This was done by conversion of existing bulk tank systems, altering formulations and products, purchasing smaller quantities more frequently to store less material in total and to shift the remaining small quantity of drum storage into the main building. This in fact

required relocating several production departments. By the middle of 1984 this project was completed and drummed chemical storage no longer existed in that bermed yard area. At that point the bermed area was of no specific use and impractical for other materials. We then relocated to this area the accumulation of empty drums from the other end of the yard. Empty drums were accumulated from regular production operations for regular pickup and removal by a licensed drum reprocessor. Since then the total volume of drum material usage has decreased such taht the generation of empty drums tends to be less than 3 dozen per month. We have just recently shifted the accumulation of empty drums into the Shipping and Receiving building to improve the visual appearance of the yard area. Currently there are no empty drums accumulated in the yard area.

### DRUM OF KEROSENE & DRUM OF DIESEL FUEL

Emerson & Cuming has recently (in the past several months) begun purchase and usage of the kerosene and diesel fuel. Two existing pieces of equipment (a fork truck & a water heater) were previously fueled with #2 heating fuel from our main fuel tank. This equipment was converted to kerosene and diesel fuel respectively due to a history of clogging from the #2 fuel oil. To the best of our knowledge we weren't aware of any problems using these drums where they were. We have purchased safety storage cabinets to install inside the building for these materials.

### MATERIAL CURRENTLY IN YARD AREA

### A. In-Process Production Materials

- º Marine Riser Modules
- Plastic Tubing for Modules
- Plastic Tube Sheets for Modules
- * Steel Module Molds
- ° 1 Drum Kerosene & 1 Drum Diesel Fuel (Moved Inside)

### B. Accumulation of Materials for Removal

- Clean, Baled Cardboard for Reprocessing
- Empty Drums for Reprocessing (Moved Inside)
- Scrap Metal for Reprocessing

### c. Other

Forklift Truck

Bobcat Tractor

BFI Trash Disposal Dumpster

### HAZARDOUS WASTE

As a hazardous waste generator we are licensed by the Massachusetts DEQE (MAD 000361709). Hazardous Waste is handled in accordance with 310 CMR 30,000. The waste is accumulated in a proper hazardous waste storage room within the Shipping/Receiving area inside the plant. On the average there are 5-6 drums per month of hazardous waste generated and accumulated in the storage room for removal. Disposal is provided by Clean Harbor which is licensed for hazardous waste. The primary waste generated is EPOXY-MCL Still Bottoms. There is also approximately 1-2 drums per year of waste lubricating oil generated. A contingency plan and management system are in place as prescribed by Massachusetts and Town of Canton regulations. To the best of our knowledge the handling of hazardous waste is in compliance with the regulations.

### MATERIALS USED AND STORED IN THE PLANT

Epoxy Resins

Epoxy Hardeners

Fiberglass Powders

Glass Microballoons

Fiberglass Fabrics

MCL Solvent

Mold Release Soap

Waterbased Latex Paint

Polywrethane Resin

Polywrethane Foam

Carbon Black

Vinyl Latex Resin

Fire Retardant Salts

Contact Cement

Fabricated Steel Components

Lumber Products

#2 Fuel Heating Oil

Kerosene

Diesel Fuel Oil

Lubricating Oils

A detailed technical listing of materials is on file with the Board of Health.

### HAZARDOUS WASTE MANIFEST

ORIGINAL - NOT NEGOTIABLE

213  MANIFEST DOCUMENT NUMBER  MA 99  SHIPPER NUMBER  CARRIER NUMBER								
E NUI	ABER			SHUPPED				
-33	00	<del></del>		27-82				
	8863			27-82				
	<del></del>	<del> </del>						
55-	8863		8-2	27-82				
Tay								
EQ'D	UNITS WT/VOL	TOTAL	RATE	CHARGES (For Carrie Use Only)				
	Gal	1980						
	Ga1	220		·				
lity is	spilled on a	vaterway or adjoining	land, the	Incident				

NAME OF CARRIER (SCAC) IDENTIFICATION COMPANY NAME, MAILING ADDRESS, AND TELEPHON 12 DIGIT EPA ID # MAD 000 Emerson & Cuming GENERATOR/ SHIPPER 59 Walpole St., Canton, MA 361 709 Chemical Waste Management MAD 980 TRANSPORTER # 1 523 203 5 Strathmore Rd., Natick, MA 65 TRANSPORTER # 2 (if required) Chemical Waste Management MAD 980 TODE TREATMENT STORAGE OR DIS -65 5 Strathmore Rd., Natick, MA 523 203

Chemical Waste Management

**WASTE INFORMATION** 

NO, OF UNITS & CONTAINER TYPE	нм	EPA HAZ. WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203	UN Ø OF NA Ø	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (IN °C) WHEN REQ'D	UNITS WT/VOL	TOTAL	RATE	CHARGES (For Carrier Use Only)
THE WHATE THE		1/1/2	111-111-411-111-111							
36 55 g dilon 0,0005	x		Solid N.O.S. +++++	NA918			Gal	1980		
55 gallon Orums	x		Hazardous Waste Liquid N.O.S.	NA918	•		Ga1	220		
Drom ³			11/1							

SPECIAL HANDLING INSTRUCTIONS

TOOF TREATMENT STORAGE OR DIS

COMMENTS

If an RO commodity is splited on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toil ree) or 202-426-2675 (toil call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

**PLACARDS TENDERED** 

On "Collect on Delivery" shipments, the lette	ers "COD" must appear before consignae's	name or as otherwise provided	in Item 430, Sec. 1	Yes 🖰	N	o 🗆
REMIT C.O.D. TO: ADDRESS		COD Amt: \$		C.O.D. FEE: PREPAID [] COLLECT []	\$	
Plate—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.  The agreed or declared value of the property is hereby specifically bleed by the shipper to be not exceeding.	"If the shipment moves between two ports by a carrier by water, the law requires that the bill of taking shall state whether it le "carrier's or shipper's weight."	Subject to Section 7 of the conditions, if the consignas without recourse on the consignation of the consignation of the corrier shall not make delivery of the freight and all either leaded charges.	nor, the consignar shall sign the s shipment without payment of	CHARGES:	\$ CHARGE	S box / charges
1	Signature	(Signature of Cons	ignor)	pricept when bee at right is checked		COMME
RECEIVED, subject to the classifications ar	nd teriffs in effect on the date of the issue of this	any of, said property over all or any				

Bill of Luding, the properly described above in appearent good order, except as noted and condition of contents of packages unknown), marked, consigned, and de indicated above which said currier (the word carrier being understood throughout this as meaning any person or corporation in possession of the property under the control to carry to its usual place of delivery at said destination, if on its route, otherwise to another carrier on the route to said destination. It is mutually agreed as to each carri deliver to er of all or

any time interested in all or any said propesty, shat every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

### CERTIFICATION

This is to certify that the above	e-named mat	erials are	properly
classified, described, packaged,	marked and	labeled, a	nd are in
proper condition for transportati	on according	to the a	pplicable
regulations of the Department of	Transportati	on and the	U.S. En-
vironmental Protection Agency	Kaa -	550	

8-27-82

This is to certify acceptance of the hazardous waste shipment.

ORTER #1 SIGNATURE & DATE TRANSPORTER #2 SIGNATURE & DATE (If req

This is to certify acceptance of the hazardous waste for treatment storage or disposal.

STYLE F-50 @ LABELMASTER CHICAGO, IL 80828

______ HAZARDOUS WASTE MANIFEST MANIFEST DOCUMENT NUMBER 99 SHIPPER NUMBER Chemical Waste Management NAME OF CARRIER (SCAC) CARRIER NUMBER IDENTIFICATION DATE SHIPPED OR RECEIVED COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER 12 DIGIT EPA ID # ME 000 Emerson & Cuming GENERATOR SHIPPER 59 Walpole St., Canton, MA 828-3300 361 709 8-27-82 Chemical Waste Management MAD 980 TRANSPORTER # 1 655-8863 5 Strathmore Rd., Natick, MA 523 203 8-27-82 TRANSPORTER # 2 (If required) Chemical Waste Management MAD 980 TSOF TREATMENT STORAGE OR DIS-POSAL FACILITY 5 Strathmore Rd., Natick, MA 655-8863 8-27-82 523 203 TROF TREATMENT STORAGE OR DIS **WASTE INFORMATION** DESCRIPTION AND CLASSIFICATION **CHARGES** O. OF UNITS & CONTAINER TYPE UN # EXEMPTION OR NO LABELS REQUIRED FLASH POINT (IN °C) WHEN REQ'D UNITS TOTAL For Carrier Use Only) HM (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203 RATE WASTE NA # بتنميليهن عهزر Hazardous Waste 36 NA9189 Gal 1980 5 34110 Solid N.O.S. 3.7.5 4 Hazardous Waste x NA9189 220 Liquid N.O.S. Ga1 Jugar Har Orums If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-8802 (toil free) or 202-426-2675 (toil call), if other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately. **SPECIAL HANDLING INSTRUCTIONS** COMMENTS **PLACARDS TENDERED** Yes 🗗 No 🔲 n "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1 NEMIT 2.0.D. TO: C.O.D. FEE: PREPAID | COLLECT | COD TOTAL CHARGES: Note—Where the rate is dependent on value, phippare i required to state specifically in writing the agreed or clared value of the property clared value agreed or declared value of the property is hereby scattering that by the shipper to be not exceeding. "If the shipment moves between two ports by a carrier by water, the law requires that the bill of lealing shall state whether it is "carrier's or shipper's weight." FREIGHT CHARGES FREIGHT PREPAID except when bex at right is checked (Signature of Consignor) PECEIVED, subject to the classifications and terriffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, escapt as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agreed to carry to its usual place of delivery at said destination, if no its route, otherwise to deliver to enother carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on The date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing clearification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns. CERTIFICATION This is to certify acceptance of the hazardous waste shipment. This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable TRANSPORTER IZ SIGNATURE & DATE (H required) ORTER OT SIGNATURE & DATE regulations of the Department of Transportation and the U.S. En-

storage or disposal.

TSDF SIGNATURE

STYLE F-50 © LABELMASTER CHICAGO, IL 60626

Firestone

500 - 850

8-27-82

vironmental Protection Agency

and & Fu

GENERATOR'S SIGNATURE

DATE

This is to certify acceptance of the hazardous waste for treatment,

BRETM THE EPOXY 828 PROFILE SHEET on THIS SHIPMENT. TALLY ECLOPOLD 4170A RESIN PONDER 1 LATEX PAINT 2 GOLIO LATEX PAINT FOXIDE - RED NON OXIDE POWDER 1 CARISON LIQUID # 16 TBS SOLID (+ SAND) (4 AIDDED) PHENOLIC RESIN POWDER ALUMINUM POWDER & DIL LIQUID EPOKY RESIN 828 DRUMS TOTAL ....

Manufact # 213

### WASTE PRODUCT SURVEY

### CHEMICAL WASTE MANAGEMENT of MASSACHUSETTS, Inc.

	hmore Road	(617) 655-		OVIDE ALL INFOR	MATION REC	DUESTED BELOW.
Natick	, MA 01760	(617) 633-		THEN RETURN TH	HIS FORM	
COMPANY FMERCON	1 + CUM		,		FLANT LOC	ALPOLE S,
MAILING ADDRESS 59 WA	LPOLE ST	CI	turar,	15050 PM	PRODUCT	
DESCRIPTION OF WASTE PRODUCT		IND		HICH GENERATES 1		
WASTE	716	1 .		- FORK +	PALLA	er TRUCKS
VOLUME		FR	EQUENCY		PACKI	wG
	RUM		PER PE		IN DRU	. , , ,
<del></del>	CIRCI	E APPROPR	IATE BLOCKS	-		<del></del>
PHYSICAL STATE @ 70° F			VISCOSITY @ 70			
SOLID	LIQUID SE	MISOLID	LOW	ME	DIUM	HIGH
LAYERING	ILAYERED	WASTE IS NOT	OMPATIBLE WITH T	THE FOLLOW	VING PRODUCTS	
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< 5% 6-20%	20% WEIGHT OR	VOLUME	( 5%)	5	-20%	> 20%
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	NTIFY AND QUANTIFY ALL	KNOWN COMPO	VENTS AND/OR CO	NTAMINENTS. IF A		
	PERFORMED OTHER TH	HAN REQUESTED		ACCORDINGLY.	<del></del>	•
VOLATILE ORGANICS	<del></del>		<u> </u>	*		<u> </u>
	<b>%</b>		*	*		<u> </u>
NON VOLATILE ORGANICS	100 *		*	*		*
ACIOS OR ALKALIS	*		*	*	5-20% > 20%  F	
SALTS	*		*	*		*
	ppm MG	pom Cu		Cr +3	ppm Zn	ppm Be
METALLICS (ppm)	ppm Mn	ppm Pb	ppm	O +6	ppm Ni	ppm Al
	ppm Fe	ppm Hg	ppm	<b>∞</b>	ррт Аз	ррт
CYANIDES, PESTICIDES CARCINOGENS, OTHER TOXICS	ppm		ppm	ppm		ppm
TOTAL ORGANIC CARBON (TOC)			TOTAL	INORGANIC CARBO	ON	
DOES THE WASTE MATERIAL CONT	AIN ANY OF THE FOLLOWIN	G? IF YES, GIVE	% BY WT.			75.2
		YES	NO			_
rchloro-organic compounds  Alorinated aromatic compounds		. —		<del></del>	<del></del>	
3. Aromatic amines finct, azo & hydra	<b>.</b>					
<u>-</u>	zo comp.)					
4. Carbemates	120 COMP.1		Z/	· · · · · · · · · · · · · · · · · · ·	<del></del>	-
Carbemates     Aromatic Urees or Thiourees	120 COMP. I		7 =		-7:	

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	Other chlorinated organics (molecule con 30% chlorine by weight)	ntains more than						
<b>3</b> .	Broming containing compounds							شبم
١.	Phosphates or Phosphorous containing of	omnounds						- J
2	Sulfur containing compounds							<del></del>
<u>.</u>	Polycyclic organic meterial			7				******
4.	Silicon containing compounds			- /				
5	Athertos						<del></del>	
ā.	Adhesive, glue or resins							
7.	Flubber, Plastic Compounds			7				
		H ANY ADDITIONAL HAZA						·
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NE	NUMBER (INCLUDE AREA CODE)			DATE				
		SAMPLE EVALUAT	TION (C	OMPLETED	BY LAB)		<del></del>	
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S	STOMER NO PRODUCT C	CODE NO NA	AME			DATE RECEI	/ED	
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		Signature			Date			
		~						

INDICATE BY A CHECKMARK, THE HAZARDOUS ITEMS OR CONDITIONS LISTED BELOW PRESENT IN YOUR CHEMICAL WASTE. PLEASE QUANTIFY EACH ITEM INDICATING WHETHER PRESENT IN ppm, gms/liter, oz/gallon, % etc. A GIVEN RANGE OR QUANTITY ESTIMATE IS ACCEPTABLE.

	1
TOXIC METALS & THEIR COMPOUNDS:	
Mercury	Cancer Suspect Agents
Chronium	Highly reactive Materials
Cadmium	E. G. Sodium metal
Lead	-Magnesium Metal Organosilanes
Zinc	Benzoyl Peroxide
Arsenic	Pesticides
Antimony	Radioactive Materials
Beryllium	Polychlorinated biphenyls or PCB's
Selenium	Polybrominated biphenyls
Silver	or PBB's
Barium	Cyanides
CONDITIONS:	
Air Reactive	Water Reactive
CAPABLE OF RAPID POLYMERIZATION	, DECOMPOSITION, OR OTHER REACTION
e.g. Monomers capable of sever storage or transportation	re polymerization at any possible n temperatures.
SHOCK SENSITIVE	
e.g. Materials capable of seven and transport conditions	ere reaction under normal handling
NONE OF THE ABOVE ITEMS OR CONDITO	ONS ARE PRESENT
·	freklan + comes
	Company
•	8/25/87
^ ^	Date

# GRACE

### **EMERSON & CUMING**

### **Dewey and Almy Chemical Division**

W.R. Grace & Co. Canton, Massachusetts 02021

ļ	PURCI	HASE ORDER NO.						
	2~	42401						
AN	THIS NO. TO APPEAR ON ALL PACKAGES AND CORRESPONDENCE PERTAINING TO THIS ORDER.							

										SHIP & BILL TO	THE L	OCATION INDI	CATED BELOW
											869 WASHI	NGTON ST., CANTO	ON, MASS. 02021
		To	. (	hemical	Waste	Managemer	it			x	59 WALPO	LE ST., CANTON, M	ASS. 02021
											604 WEST	182nd ST., GARDEN	A, CALIF. 90246
				5 Strati							3450 COM	MERCIAL AVE., NOF	RTHBROOK, N.L. 60062
			1	latick,	Hass.	01760				<u></u>		1	MASS. CERTIFICATE 135-114-230
										SUBJECT TO			CALIF. CERTIFICATE SYOHB 96-038849
										NOT SUBJE	CT TO STA	TE SALES TAX	3 ILLINOIS CERTIFICATE
1	PAYN	MENT TERMS		F.O.B.			AT TERMS	T	REQUISITIONER	1	REQUIF	REMENT DATE	1 0.0-0.3-2
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						- 1				<b>Dewey and</b> W.R. Grose &		Chemical Di	vision 🛔
			DE	CEIVING	2 SCHE	DI II E	•			W. C.	× CO.	<b>h</b> \/.	4
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# Minifiest 213 HAZARDOUS WASTE SHIPMENTS WEGENTED

70 6617 #	DRUM #	DESCRIPTION AUG 26 1982	SHIP
210	1-29	LIQUID CARBON BLACKRAFIC-DEPARTMENT	
210	30-40	_SOLID _ CARBON BLACK	7/26/82
212	41	METHYLENE CHLORIDE	8/18/87
_212	42-50	. UNCURED RESIN, METHYLENE CHLORIDE_	8/18/82
212	51-58	CARBONLIQUID	8/18/82
212	59-70_	PLIOBOND WASTE	8/18/87
212	7	EPOXIDE_8	8/18/82
212	72	LIOUID LATEY PAINT	8/18/82
212	73-76	CARBON SOLID	8/18/82
. 212	77-80	CURED_EPOXY, MICROBALLOONS	8/18/82
313		EUDMOND 4120A RESIN POWDER	8/27/82
21.3	109	LIQUID LATEX PAINT	8/27/82
213	109 _ 110	SOLIO_LATEX_PAINT	58/75/8
213		FOXIDE	8/27/8Z
213		CARBON SOLID	_ 28/76/8 
213		CARBON LIQUID	C8/76/8
	119134	TBS_ SOLID	8/27/82
913	135	PMDA	8/27/8:
	136	WASTE OIL	5/27/8:
213	13_7	PHENOLIC RESIN POWDER	8/27/82
213	138, 139	ALUMINUM POWDER & OIL	8/37/92
213	140	LIQUID EPOXY 878	8/27/82

NAME			AILING ADDRESS			I DI	ONE NUMBER	STATE/E.P.A. I.D. NO.
Emerson & Cuming	59 Wal		t., Canton	. MA	02021	(617)	828-3300	
ANSPORTER al Waste Management			Rd., Natio	4			655-8863	And the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second s
TRANSPORTER	3 5014	LIMOT 6			02700	( )		
al Waste Management	5. Strat	thmore	Rd., Natic	c, MA	01760	(617)	655-8863	
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U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N. / N.A. NO.	WT./VOL.	UNITS	CODE	NO. T	PE NO.	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
ardous waste Liquid N.O.S.	orm.E	9189	00330	Gal	LG.	ecc i	B LAXELE	Waste Carbon Liquid
dous Waste Solid N.O.S.	arme	9189	0.00055	Gal	[9]	OWN PE		Waste Carbon Solid
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dous Waste Liquid N.O.S.	ORNE	NA 9189	0.012/2/01	Gal	<b>G</b>			Waste Epoxy Resin, 1 balloons, Methylene
011: N.0.5	CIONID TO STANDING IS	UN 1270	roomso.	Gal	g		ALIEN KONE	Dalloons, municipal
dous Waste Solid N.O.S.	ORME	NA 9189	Inmoved	Gal	(C)			Waste Plicbond Adher

NA = NO NUMBER AVAILABLE

* A MANIFEST CORRECTION

	IN THE EVENT OF A SPILL, CO	NTACT THE NATIONAL RESPONSE CENTER, U.S	S. COAST GUARD 1-800-424-8802
LABELS	THIS IS TO CERTIFY THAT IAM THE PRIMARY TRANSPORTER AND HAVE ACCEPTED THE DESCRIBED SHIPMENT IN PROPER CONDITION FOR TRANSPORT TO THE IDENTIFIED H.W.F.	Jan Pane	DATE SHIPMENT ACCEPTED  MONTH DAY YEAR  II LE 32  VEHICLE 10
REQUIRED	THIS IS TO CERTIFY THAT I AM THE CONTINUING TRANSPORTER AND HAVE ACCEPTED THE DESCRIBED SHIPMENT IN PROPER CONDITION FOR TRANSPORT TO THE IDENTIFIED H.W.F.	SIGNATURE OF TRANSPORTER  SIGNATURE OF TRANSPORTER	DATE SHEMENT ACCEPTED STATE COMP MOTH DAY YEAR YEHICLE I.D.

INDICATE ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT AND LIST REJECTED MATERIALS, INDICATE DISPOSITION OF REJECTED SHIPMENT

I CERTIFY THAT THE DESCRIBED WASTE(S) WAS DELIVERED BY THE AFOREMENTIONED DELIVERING TRANSPORTER AND THAT THE INFORMATION ON THIS

MANIFEST IS CORRECT TO THE BEST OF MY KNOWLEDGE.

SIGNATURE



**5 STRATHMORE ROAD** NATICK, MA 01760 (617) 431-7942 (617) 655-8863

Invoice

No. 3819

Date 7/12/83

Your Order No. 2-43714

Shipped to

old To

onJones

Emerson & Cuming 869 Washington St.

Canton, MA 02021

Attn: Paul Firestone

our Order No.	Salesman D Terms F.O.B. Pate Shipped VIA 7/11/83 OT									
Quantity Ordered	Quantity Shipped		Stock Number/Description					Unit	Amount	t
	1	55 gal w	aste PCB's (arachlo	ors)		25	00		250	bo

Reference Mass manifest No. MA0087313

89 13 666°

EMERSON & CUMING

CANTON, MASS. 02021

OK TO PA

Original /Invoice



## HAZARDOUS WASTE MANIFEST

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I CERTIFY THAT THE DESCRIBED WASTE(S) WAS DELIVERED BY THE AFOREMENTIONED DELIVERING TRANSPORTER AND THAT THE INFORMATION ON THIS MANIFEST IS CORRECT TO THE BEST OF MY KNOWLEDGE.

HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

• .	HAZ	ARDOUS	S WASTE M	ANIFEST AND	SHIPPING P	APER	
NAME	T	N	IAILING ADDRESS		PHONE	NUMBER	STATE / E.P.A. I.I
ERATOR			_		617. 0	20-2300	WA   000 361
merson & Cuming	59 Walpo	ole St	. Canton,	MA 02021	( 617) 82	28-3300	
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Razardous Waste Solid N.O.S.	ORM-E	NA9189		Gal	003	B001	and sand
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SIGNATURE OF TRANSPORTER
INDICATE ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT AND LIST REJECTED MATERIALS, INDICATE DISPOSITION OF REJECTED SHIPMENT

MANIFEST IS CORRECT TO THE BEST OF MY KNOWLEDGE.

SIGNATURE
SIGNATURE
SIGNATURE
SIGNATURE

## HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

• *						*			•
NAME	T	N	AILING ADDRESS	<del> </del>			PHONE	NUMBER	STATE/E.P.A.
EMERATOR Emerson & Cuming	59 Wal	59 Walpole St. Canton, MA 02021			( 617	7 ) 82	8-3300	M A D 000 S	
RIMARY TRANSPORTER Chemical Waste Management	5 Stra	5 Strathmore Rd. Natick, NA 01760					7 ) 65	5-8863	H A D 980 5:
ONTINUING TRANSPORTER						- (	)		
Chemical Waste Management	5 Stra	thmore	Rd. Natic	k, MA	01760	, 617	65	5-8863	M A D 980 5
F MORE THAN ONE MANIFEST/ TOTAL NO. OF SHIPPING PAPER IS USED: FORMS ARE	THIS FORM NO. IS	MAN	IFEST NO OF FR	STFORM	DATESH			28 83	EXPECTED ARRIVAL MONTH
U.S. D.O.T. SHIPPING NAME	D.O.T. HAZARD CLASS	U.N. / N.A. NO.	WT./VOL.	UNITS	UNIT	CONTAI	NER TYPE	E.P.A. WASTE NO.	DESCRIPTION OR ANALYSIS IF WASTE
Waste Oil N.O.S.	Combustible Liquid	UN1270	0 0 1 1 0	Gal	7 C	002	DR	K001	Waste Lubricati
Waste Methylene Chloride	ORM-A	UN2315		Gal		005	DR	F 0.0 2	
Waste DDSA (Non-hazardous)	NONE	NONE	0.7.1.5	Gal		<b>1011</b>	DR	NONE.	
Waste Carbon Water & Sludge	none	NONE		Gal		007	DR	HORE	
Waste Pliobond Adhesive	NONE	NONE	00275	Gal	203	005	DR	NONE	
Waste Paint, Sludge (WOW-HAZARDOUS)	NONE	NONE	00275	Gal		205	DR	NONE	,

	In the event of a spill , contact the national <u>re</u> sponse center, u.s. c	OAST GUARD 1-800-424-8802
REQUIRED LABELS	THIS IS TO CERTIFY THAT IAM THE PRIMARY TRANSPORTER AND HAVE ACCEPTED THE DESCRIBED SHIPMENT IN PROPER CONDITION FOR TRANSPORT TO THE IDENTIFIED H.W.F. SIGNATURE OF TRANSPORTER	MONTH DAY YEAR VEHICLE THE COMPANY NO MARINE OR RA
LAGARDS REQUIRED	THIS IS TO CERTIFY THAT I AM THE CONTINUING TRANSPORTER AND HAVE ACCEPTED THE DESCRIBED SHIPMENT IN PROPER CONDITION FOR TRANSPORT TO THE IDENTIFIED H.W.F.  SIGNATURE OF TRANSPORTER	DATE SHIPMENT ACCEPTED MONTH DAY YEAR VEHICLE I.D.

# JET-UNG

## ANNUAL HAZARDOUS WASTE REPORT

## PART 1

This form must be used for submission of Annual Reports by:

- Generators who meet the definition of Large Quantity Generator, or who generate any amount of PCB wastes in concentrations of 50 ppm or greater.
- Facilities which treat, store, use or dispose of hazardous waste at the site of generation.
- Owners/operators of wastewater treatment units (as defined in 310 CMR 30.605).

Please refer to the Part I Instructions before completing this form.

Type of Report (s): che	ck where applicable	· r	
( ) Generator	( x ) Treatment, Storage, Dispo	osal Facility and/or Wastewater Treatment Unit	
Reporting Year: Year	ending 19 <b>83</b>		,
EPA Identification Nu	mber: MAD00036170	┸╾┩	ATTACH MAILING LABEL
Installation's Name:	EMERSON & CUMING UNIT, DEW CHEMICAL DIVISION, W.R. GR		MAILING I
Installation's Address:	59 WALPOLE STREET		MAI
	CANTON, MASS. 02021		CH
Installation Contact:	JAY MCHEFF	Tel. No.: 828-3300	ATTA
	discharge process wastewater? stion 8. If Yes, complete the appropria		
) NPDES Permit Numb	er (b) Mun	icipal sewerage system (Name)	
Yes Which?	ter discharges indicated in (a) or (b) in(a)(b)		
Is your installation list	ed as an Air Quality Source Registrat	ion? Yes No	
Transportation Service	es Used: (List name and EPA ID num	ber of each.)	
CHRMIC	AL WASTE MANAGEMENT	JET LINE SERVICES	
5 STRA	TEMORE ROAD	441-R-CANTON ST.	
	, MASS. 01760 80 523 203	STOUGHTON, MASS. 02072 MAD 062 179 890	
I certify under penalty o attached documents, and the that the submitted informa	at based on my inquiry of those individuals imn	niliar with the information submitted in this document and all nediately responsible for obtaining the information, I believe are that there are significant penalties for submitting false	
requested that such material	be kept confidential and the Department has me	n will not be considered confidential unless <u>[hav</u> e specifically ade a determination of confidentiality in accordance with 310 epartment Records and Files under the Hazardous Waste	
Authorized Signature of	Owner/Operator or Designated Official	Date Signed	
RANDOLPH M. O	LSON	PLANT MANAGER	
	rint or Type Name	Title of Person Signing	

## GENERATOR ANNUAL REPORT

Reproduce additional pages as necessary. Enter the page number of each sheet, as well as the total number of pages, in the lower right corner.

- 11. Generator's EPA Identification Number: MADOOO361709
- 12. On-Site Treatment as an Integral Part of the Manufacturing Process: (This is an optional question.)

A Description of Waste	B Hazardous Waste Number	C Amount of Waste	D Unit of Measure	E Handling Method

13. Waste Shipped Off-Site: (Complete a separate Part 2 Form for each facility to which waste was shipped.)

a)	Name of	Facility:	CHEMICAL WASTE MANAGEMENT
----	---------	-----------	---------------------------

b) EPA ID Number: A L D 0 0 0 6 2 2 4 6 6

c)	Address	(Street o	r P.O.	Box):	P. O. BOX 55

(City, State and Zip Code): EMELLE, AL. 35459

Line Number	A Description of Waste	B Hazardous Waste Number	C Amount of Waste	D Unit of Measure	E Handling Method
1	WASTE PCB's	11002	20	G	<b>501</b>

14. Comments (refer to line number):

## (Continued)

13. Waste Shipped Off-Site: (Complete a separate Part 2 form for each facility to which waste was shipped.)

a) Name of Facility: CHEMICAL WASTE MANAGEMENT

MAD 9 8 0 5 2 3 2 0 3 b) EPA ID Number:

c) Address (Street or P.O. Box): 5 STRATHMORE ROAD

(City, State and Zip Code): NATICK, MASS.

	* <del></del>				
Line Number	A Description of Waste	B Hazardous Waste Number	C - Amount of Waste	D Unit of Measure	E Handling Method
1	HAZARDOUS WASTE LIQUID N.O.S.	D001	2035	G	<b>801</b>
2	HAZARDOUS WASTE SOLID N.O.S.	D001	165	G	<b>S01</b>
3	WASTE OIL N.O.S.	M001	110	G	<b>S01</b>
4	WASTE METHYLENE CHLORIDE	<b>P</b> 002	275	G	<b>S01</b>
		·			

14. Comments: (refer to line number)

LIME 1

385 Gal WASTE ADBESTVE

> 880 Gal WASTE TERTBUTYLSTYRENE, INHIBITED

770 Gal WASTE CARBON SOLUTION

LINE 2 165 Gal WASTE TERTBUTYLSTYRENE, ASPHALT AND SAND (FROM SPILL)

## (Continued)

13.	Waste Shipped Off-Site: (Complete a separate Part 2 form for each facility to which waste was shipped.)							
	a)	Name of Facility: JET LINE SERVIES						
	b)	EPA ID Number: MAD 0 6 2 1 7 9 8 9 0						
	c)	Address (Street or P.O. Box): 441 - R - CANTON ST.						
		(City State and Zin Code): STOUGHTON, MASS. 02072						

Line Number	A Description of Waste	B Hazardous Waste Number	C Amount of Waste	D Unit of Measure	E Handling Method	
1	WASTE OIL N.O.S.	M001	1000	G		
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14. Comments: (refer to line number)

LINE 1 CLEAN-UP OF RAW SEWAGE OVERPLOW FROM MDC SEWER - HAD GREASE/OIL FILM ON TOP.

Page 4 of 6

## FACILITY ANNUAL REPORT

15. Facility's EPA Identification Number: MADOOO361709

## 16. Waste Identification:

Line Number	A Description of Waste	B Hazardous Waste Number	C Handling Method	D Amount of Waste	E Unit of Measure
1	WASTE PCB's	M002	<b>S</b> 01	20	G
2	WASTR CIL N.O.S.	M001	<b>S01</b>	110	G
3	WASTE OIL N.O.S.	H001	S02	1000	G
. 4	WASTE METHYLENE CHLORIDE	F002	S01	275	G
5	HAZARDOUS WASTE LIQUID N.O	.s. DO01	<b>S01</b>	2035	G
6	HAZARDOUS WASTE SOLID N.O.	s. D001	<b>S01</b>	165	G
7					
8					

## 17. Recovered Materials: (Optional)

Line Number	A Description of Material	B Handling Method	C Amount	D Unit of Measure
		T		_

Page 5 of 6

## FACILITY ANNUAL REPORT

18.	Most Recent Closure Cost Estimate:	\$6,000.
19.	Most Recent Post-Closure Cost Estimate:	\$0.
20.	Summary of Incidents When the Contingenc	y Plan was Implemented:

- 21. Comments (refer to question and line number):
  - LIME 16 (LINE NUMBERS 546) SINCE WE SHIPPED THESE MATERIALS, WE HAVE DETERMINED THEM TO BE HOW-HAZARDOUS WASTES. WE STILL SHIP THESE TYPES OF CHENICAL WASTES TO CHENICAL WASTE MANAGEMENT OF MATICK, MASS., ALTHOUGH THEY ARE CONSIDERED HOW-HAZARDOUS BY DEFINITION OF CHARACTERISTICS.

Page <u>6</u> of <u>6</u>

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To .

## **EMERSON & CUMING**

## **Dewey and Almy Chemical Division**

W.R. Grace & Co.

Chemical Waste Management

5 Strathmore Road Natick, MA 01760 Canton, Massachusetts 02021

PURC	HASE ORDER NO.	
2-	51744	
HIS NO. T	O APPEAR ON ALL PACKAGE SPONDENCE PERTAINING T	ES

7.	
SHIP & BILL TO THE LOCA	TION INDICATED BELOT
869 WASHINGTON ST.,	CANTON, MASS. 02021
59 WALPOLE ST., CAN	TON, MASS. 02021
604 WEST 182nd ST., G	ARDENA, CALIF. 80248
3450 COMMERCIAL AV	PE, NORTHBROOK, ILL. 60062
	MASS. CERTIFICATE
SUBJECT TO STATE SALES TAX	CALIF. CERTIFICATE

	ENT TERMS	F.O.B.	a	TRANSPORT TERMS Delivered	REQUISITIONE  J. CC	R DHENNO	REQUIREMENT DATE  6/12/84  ORDER DATE	
	ur deliver	Y					6/6/84	
TEM	QTY. ORDERED	UNIT OF MEASURE	DESCRIPTION	OF GOODS AND/OR SERVICES	O BE RENDERED.	CODE	WINIT PRICE	ALLOCATION
A	55 Gal. 2x5 gal.	drums	Chemical Braintre Illinois	waste transporte Services, Quincy e, MA and them t for incineration ste polyshlorinat	, Ave, o SCA, as follows		Advise	2608700
				on 17E pails over lon Drum with Spe				
				tion Certificate ( ion musdibe return L Cuming				
.			transport	rdous waste to be ted for disposal, cordance with all I Local requiremen	and dispos	ad.		

EMERSON & CUMING
Dewey and Almy Chemical Division
W.R. Grace & Co.

## **RECEIVING SCHEDULE**

By Willaken BUYER

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NAME		,	MAILING ADDRESS			PHO	NE NUMBER	STATE/E.P.A. I.D.
ATOR. RSON & CUMING, W.R. GRACE &	CO. 59 WA	LPOLE S	TREET, CÁN	TON, N	1A 020	24 617)	828-3300	M A D 0 00 3 6
RY TRANSPORTER MICAL WASTE MANAGMENT	5 STR	ath <b>o</b> ore	ROAD, NAT	ICK, N	A 0176	0 ( 617)	655~8863	MA   D.9 80 5 2
NUING TRANSPORTER				₹ 		( )		
CHEMICAL SERVICES INC	QUINC		E, BRAINTR			11	849-1800	M.A. D. 0. 53 45 2
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TE POLYCHLORINATED BIPHENYLS	ORM-E	UN2315	10	GAL		0 4 17	H.O.O.P	ARACHLOR 1254 CWM #D82566
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SPECIAL HAN	IDLING INSTRUCTIO	NS INCLUDI	NG ANY CONTAINE	R EXEMP	TION; AND E	MERGENCY RES	PONSE INFORMAT	ION:
INCINER	ATION CERTI	FICATE	TO VERIFY	DESTRI	UCTION 1	must be r	ETURNED TO	GENERATOR
TWO FIVE	GALLON 17	e pails	OVERPACKE	D IN 1	A 55 GAI	LLON DRUM	WITH SPEE	DI DRI
	VENT OF A SPILL,	CONTACT TO	JE NATIONAL DES	DONSE CE	ENTER HE A	COAST CHASO	- 800-424-8802	
		CONTACT TO	A A	- 01132 01	A #		RE ACCEPTED	STATE COMPANY NO. FOR TR
THIS IS TO CERTIFY THAT I TRANSPORTER AND HAVE A DESCRIBED SHIPMENT IN PR FOR TRANSPORT TO THE ID	CCEPTED THE OPERCONDITION		Racle SIGNATURE OF TRA	NSAGRER	itile			VEHICLE MA MARINE OR RAIL MB6927
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SIGNATURE OF TRANSPORTER

INDICATE ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT AND LIST REJECTED MATERIALS, INDICATE DISPOSITION OF REJECTED SHIPMENT

I CERTIFY THAT THE DESCRIBED WASTE(S) WAS DELIVERED BY THE AFOREMENTIONED DELIVERING TRANSPORTER AND THAT THE INFORMATION ON THIS

MANIFEST IS CORRECT TO THE BEST OF MY KNOWLEDGE.

SIGNATURE

MONTH DAY YEA

- A		
REQUESTING DEPARTMENT: MAINT #	<del></del>	·
DEPARTMENT CONTACT: H, FAFFNEY		• • • • • • • • • • • • • • • • • • • •
DATE OF REQUEST: 10-29-84		
DATE TRANSFER REQUIRED: 11-2-84		
WASTE INFORMATION	<u>.</u> .	
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Solid Waste?		V
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Any Residue on Drum?	• • •	V
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Is Drum Identified With Weatherproof Label?		
Is Drum Full?		
Is There any refuse or garbage in drum?		
Is Profile Sheet on File?	_ <u> </u>	
Supervisor's Signature: Lory ()	1.11	

REQUESTING DEPARTMENT: MAINT I		
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DEPARTMENT CONTACT: H. GAFFNEY	<del></del>	<del> </del>
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Any Residue on Drum?		~
Is Drum Sealed Tight?	~	·
Is Drum Identified With Weatherproof Label?	$\checkmark$	
Is Drum Full?	~	
Is There any refuse or garbage in drum?		~
Is Profile Sheet on File?	$\checkmark$	-1.1.
Supervisor's Signature. John C.H.	Mes	

REQUESTING DEPARTMENT: MAINT I		
DEPARTMENT CONTACT: H. GAFFNEY		
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DATE TRANSFER REQUIRED: 11-2-84		
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Is Drum Identified With Weatherproof Label?	$\checkmark$	
Is Drum Full?	~	
Is There any refuse or garbage in drum?		V
Is Profile Sheet on File?		
Al mail	(I, M, IL)	d

## GRACE

## EMERSON & CUMING

## **Dewey and Almy Chemical Division**

W.R. Grace & Co.

Canton, Massachusetts 02021

PURCHASE ORDER NO.

2- 54563

THIS NO. TO APPEAR ON ALL PACKAGES AND CORRESPONDENCE PERTAINING TO

SHIP & BILL TO THE LOCAT	ON INDICATED BELOW
BES WASHINGTON ST., C.	ANTON, MASS. 02021
59 WALPOLE ST., CANTO	N, MASS. 02021
604 WEST 182nd ST., GAR	IDENA, CALIF. 90246
3450 COMMERCIAL AVE.	NORTHBROOK, ILL. 80082
	MASS, CERTIFICATE
SUBJECT TO STATE SALES TAX	CALIF. CERTIFICATE SYOHE 96-0306-49
MOT SUBJECT TO STATE SALES YAY	ILLINOIS CERTIFICATE

t 30			TRANSPORT TERMS	REQUISITIONER	REQUIREMENT DATE	
VIA	1	Canton Pick	up OP	VENDOR NUMBER	NO Advise ORDER DATE	
ır Pickup				·	11-26-9	1
QTY. ORDERED	UNIT OF MEASURE	DESCRIPTION (	OF GOODS AND/OR SERVICES	TO BE RENDERED. CODE	UNIT PRICE	ALLOCATION
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6 drs.	ea.			, methylene	•	·
1 pr.	ea.	Pliobon (	i adhesive MAT	082565 (non haz.)	•	
15 drs.	ea.			r, MAT D66278	•	
			Confirming	<b>a</b>		
	4 drs. 6 drs. 1 Dr.	4 drs. ea. 6 drs. ea. 1 Dr. ea.	4 drs. ea. Hazardon lubrication de drs. ea. Drums chloride la drs. ea. Pliobone la drs. ea. Pliobone la drs. ea. Pliobone la drs. ea. Pliobone la drs. ea. Pliobone la drs. ea. Pliobone la drs. ea. Pliobone la drs. ea. Pliobone la drs. ea. Please e	4 drs. ea. Hazardous waste Oil M. lubrication) NAT E1013 6 drs. ea. Drums Hazardous Waste chloride, NAT E10136 1 Dr. ea. Pliobond adhesive NAT 15 drs. ea. Epoxy resin with fille: (non-haz.)  Please call Anne Fish TEL: 828-3300, ext. 1	4 drs. ea. Hazardous waste Oil N.O.S. (pump lubrication) NAT ElOl33  6 drs. ea. Drums HazardousWaste, methylene chloride, NAT ElOl36  1 Dr. ea. Pliobond adhesive NAT D82565 (non haz.)  15 drs. ea. Epoxy resin with filler, NAT D66278	OTY. ORDERED UNIT PRICE DESCRIPTION OF GOODS AND/OR SERVICES TO BE RENDERED. CODE UNIT PRICE  4 drs. ea. Hazardous waste Oil N.O.S. (pump lubrication) NAT E10133  6 drs. ea. Drums HazardoussWaste, methylene chloride, NAT E10136  1 Dr. ea. Pliobond adhesive NAT D82565 (non haz.)  15 drs. ea. Epoxy resin with filler, NAT D66278 (non-haz.)  Please call Anne Fish with prices TEL: 828-3300, ext. 126.

EMERSON & CUMING
Dewey and Almy Chemical Division
W.R. Grace & Co.

## RECEIVING SCHEDULE

To • Chemical Waste management 5 Strathmore Road Natick, Mass. 01760

By McCallaka. WYER

_					_				BUYER
İ	DATE REC'D	SIGNATURE OF RECEIVER	QTY. RECEIVED	BAL TO COME	Å	DATE REC'D	SIGNATURE OF RECEIVER	QTY. RECEIVED	BAL TO COME
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## GRACE

## **EMERSON & CUMING**

## **Dewey and Almy Chemical Division**

W.R. Grace & Co.

Canton, Massachusetts 02021

ļ	PURC	HASE ORDER NO.
	2-	54563
HI	S NO. T D CORRE	O APPEAR ON ALL PACKAGES SPONDENCE PERTAINING TO THIS ORDER

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										669 WASHINGTON ST., CA	NTON, MASS. 02021
	To .	Chemic	al Wast	e Manag	rement				X	59 WALPOLE ST., CANTON	, MASS. 02021
			thmore						$\overline{\Box}$	604 WEST 182nd ST., GARE	ENA CALIF 00246
		Matick	., Mass.	01760	)				n	3450 COMMERCIAL AVE, I	
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	L		L					EN	JERSON A	CUMING	

RECEIVING SCHEDULE

Dewey and Almy Chemical Division W.R. Grace & Co.

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## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING DIVISION OF HAZARDOUS WASTE

MA BUOCUUU

		One	Winter Street				/,	An Car
			ssachusetts 0210	8C		1	n d	No.
lea	se print or type. (Form designed for use on elite (1)	2-pitch) typewriter.)				lu lu l		
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Ī		MERSON & CUN			i e	Manifest Docum	ent Number	
-	W.	R. GRACE & WALPOLE ST	CO. REET			1082553		
	4. Generator's Phone (617 )828-336	ANTON, MA. C	2021		B. State	Gen. ID		
ł	4. Generator's Phone (SI/)828-330 5. Transporter 1 Company Name		C 5131	Trans. ID				
Į	CHEMICAL WASTE MANAGE	2   0  3	414	18 69 3	21.	1.1		
Ì	7. Transporter 2 Company Name	8.	US EPA ID Number	1	D. Tran	sporter's Phote (	bid la	55.872
j	-	Lt.	111111		E. State	Trans. ID 🔫		
Ì	9. Designated Facility Name and Site Address	10.	US EPA ID Number			11111	111	11
ļ	CHEMICAL WASTE MANAGE	MENT				sporter's Phone (	)	
	10 MERCER ROAD	lae		12.0.1		e Fecility's ID	Not Re	
	NATICK, NA 01760	R   I	M 19 8 95 2 3	12. Cont		lity's Physica (6)	14.	2865
	11. US DOT Description Including Proper Shippi	ng Name, Hazard Class, ar	nd ID Number)	1		Total	Unit	Waste No.
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	<b>b</b> .		C-10133		<del>                                     </del>			A. S
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Ř.	* Waste Spent		E10138				W	
7		NON-HAZ)		١	1	1 1 55	GAL	(I)K
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	J. Additional Descriptions for Materials Listed A		V/ 1 X 4 D/(12/4 A)	Carple Wilson	K. Han	aling Codes for W	astes Listed	Above
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Į	b. 15. Special Handling Instructions and Additiona	I d.	<del></del>	· <del></del>	D. —	<u>, 101, </u>	0.	
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	He de	L- Un re	melated				<b>₩</b>	HE)
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	16. GENERATOR'S CERTIFICATION: I hereby d							
Ì	are classified, packed, marked, and labeled, government regulations, and all applicable \$		roper condition for transpor	ena undirima	y accordi	ng to applicable in	ternational a	
				<del>)</del>	$\mathcal{A}$			Date
	Printed/Typed Name		Signature		Han	A. A-	Month	Day Year
7	17. Transporter 1 Acknowledgement of Rec	eipt of Materials	- JORG		rus	20	1/100	Date
Ř	Printed/Typed Name		Signature /	VP		1	Month	Day Year
S	WALK J. PURCE	6	Mach	- 14	1 de	W .	168	106 Ay
Q	18. Transporter 2 Acknowledgement of Rec	eipt of Materials						Date
TRANSPORTER	Printed/Typed Name		Signature /				Month	Day Year
*	19 Disagraphan Indication Second			<del></del>		<u></u>		
F	19. Discrepancy Indication Space						Reco	·
A					•		· · · · · · · · · · · · · · · · · · ·	·- '
1	<u></u>							
L	20. Facility Owner or Operator: Certification of	receipt of hazardous mater	rials covered by this manifes	t except as	noted in I	tem 19,		
T							_ L	Date

Form Approved OMB No. 2000-040 EPA Form 8700-22 (3-84)

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ase print or type. (Form designed for use or	n elite (12-pitch) typewriter.)		Form Ap	proved. OMB	No. 200	E DITE V 3 / 8
UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)	21. Generator's US EPA ID No.  M. AD .0.0.0.03.6.1.70	Manifest Document No.		age Informa areas is law.		shaded ed by Federal
W.R. G 59 WAL	N & CUMING RACE & CO. POLE STREET		MA	e Manifest D B0825 te Generato	53	lumber
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coemical Master	IN TURNATURE STATE	93902		sporter's Ph		···
26. Transporter Company Name	27. US EPA ID Num	ber		te Transport nsporter's P		
28. US DOT Description (Including Proj	per Shipping Name, Hazard Class, and I	D Number) No.		30. Total Quantity	31. Unit Wt.Vol	R. Waste No.
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34. Transporter Acknowledgem Printed/Typed Name	ent of Receipt of Materials Signature	V			· · · · · · · · · · · · · · · · · · ·	Date Month Day Yea
35. Discrepancy Indication Space						<u> </u>
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## TRANSMITTAL STATEMENT

to be mailed with the Annual Report

## EMERSON + CUTING/W.R. GRACE

MED 000361709

Name of Installation

EPA Identification No.

Please	check	the appropriate response(s):
1.	$\checkmark$	We are submitting the Annual Report as required.
2.		We are submitting Part 1 of the Annual Report but do not feel we are required to complete Parts 2 or 3 for the following reasons:
		We did not manifest any hazardous waste (in quantities described in Who Must File) but will retain our status as a Generator for possible future use.
		We did not manifest hazardous waste in the quantities described in Who Must File and would like to change our status to Small Quantity Generator.*
		We did not manifest any hazardous waste, or did not generate as much as 20 kilograms of non-acutely hazardous waste in any one month, at this address and request that our EPA ID Number be withdrawn.*
		We moved our operation during 1984 and are now located at:
		New EPA Identification Number:
		We generate only waste oil.

* Companies requesting a change of status will be sent a Certification Statement to be completed. The change of status will be confirmed by DEQE in writing. Companies contemplating a move during 1985 should apply for a new EPA Identification Number and Certification Statement to withdraw their existing ID prior to the move.

## ANNUAL HAZARDOUS WASTE REPORT

## PART 1

Par	t 1 of the Annual Report is to be completed by all respondents.	
1.	Current Status of Installation: check where applicable	
<b>(</b>	Generator ( )Treatment, Storage, Disposal Facility ( )Wastewater Treatment	tment Uni
2.	Reporting Year: Year ending 1984	
3.	EPA Identification Number: MADO00361709	
4.	Installation's Name: EMERSON + CUHING /W.R. GRACE + CO	
5.	Installation's Address: S9 WALPOLE STREET	ABE
	CANTON, MA 02021	NG L KECT
6.	Installation Contact: J.T. COHENNO/R. 17. OLSONTel. No.: 823-3300	I MAILING INCORRE
7.	Does your installation discharge process wastewater? Yes X No	¥ ¥ N Y N Y N Y N Y N Y N Y N Y N Y N Y
	If yes: (a) NPDES Permit Number	ATTACH MAILING LABEL IF INCORRECT
	(b) Municipal sewerage system	<b>⋖</b>
	Is the wastewater considered hazardous prior to processing?	
	Yes No (If yes, complete Part 3, line 16.)	<del></del>
8.	Is your installation registered with the Division of Air Quality Control?	
	YesNo (For verification, contact your DEQE Regional office.)	
9.	Transportation Services Used: (List name and EPA ID Number of each.)	
	CHETICAL WASTE MANAGEMENT - MAD980523203	
10.	Certification:  I certify under penalty of lew that I have personally examined and am familiar with the information submitted in this document an attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information. I belinks the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting finformation, including the possibility of fine and imprisonment.	leve
	In addition, I understand that any material supplied with this application will not be considered confidential unless I have specific requested that such material be kept confidential and the Department has made a determination of confidentiality in accordance with CMR 3.00, Regulations Governing Access to and Confidentiality of Department Records and Files under the Hazardous Williamsgement Act.	1)0
	Authorized Signature of Owner/Operator or Designated Official Date Signed	
	Print or Type Name Title of Person Signing	

Massachusetts Form 1/85

## GENERATOR ANNUAL REPORT

To complete this part of the report, refer to all your manifests for the calendar year. Separate your manifests by receiving facility.

- 11. Generator's EPA Identification Number: nADOOO36179
- 12. Waste Shipped Off-Site: (Complete a separate page for each facility to which waste was shipped. Reproduce additional pages as necessary.)
  - a) Name of Receiving Facility: CHETICAL WASTE MANAGEMENT
  - b) Facility EPA ID Number: MAD780523203
  - c) Facility Address: <u>/O MERCER ROAD</u>, <u>NATICE MA</u>
    (Street or P.O. Box) (City) (State)

(If the waste was exported to a foreign country, enter Waste Exported on line b. and identify the U.S. border point of departure in Comments, line 13.)

Line Number		B EPA Waste Number	C Quantity of Waste	D Unit Code (G,P,T,Y)	E Receiving Facility Handling Code
	METHYLENE CHLORIDE	F002	2860	G	50/
2	OIL N.O.S.	M001	220	G	So/
3	STYPENE MONONUR INHIBITED	D001	110	G	SOL
4	HETHYL ETHYL KEYTONE	U159	<u> </u>	ઉ	301

### Instructions:

- A. To identify your wastes, refer to your manifests. The description will usually be the U.S. DOT shipping name. Use a separate line for each type of waste. Number lines consecutively. Duplicate page as necessary.
- B. The EPA Waste Number (Block I. on the Uniform Manifest Form) can also be found in Massachusetts regulations, 310 CMR 30.120-30.136. The number will be a 4-digit code, beginning with a letter, followed by 3 numbers.
- C. Enter the total amount of this particular waste which was shipped to this facility during the calendar year.
- D. The unit codes are: G gallons; P pounds; T tons; Y cubic yards. If you shipped waste in 55 gal. drums, multiply number of drums by 55, enter G.
- E. Receiving facility handling codes are found in Block K on the Uniform Manifest. This code will be a letter (S, T, or D), followed by 2 numbers.

## GENERATOR ANNUAL REPORT

To complete this part of the report, refer to all your manifests for the calendar year. Separate your manifests by receiving facility.

- 11. Generator's EPA Identification Number: MBD000361709
- 12. Waste Shipped Off-Site: (Complete a separate page for each facility to which waste was shipped. Reproduce additional pages as necessary.)
  - a) Name of Receiving Facility: SCA CHEMICAL SERVICES TNC
  - b) Facility EPA ID Number: MADC63452637
  - c) Facility Address: OUINCY AVENUE BRAINTREE MA (Street or P.O. Box) (City) (State)

(If the waste was exported to a foreign country, enter <u>Waste Exported</u> on line b. and identify the U.S. border point of departure in Comments, line 13.)

Line Number	-	B EPA Waste Number	C Quantity of Waste	Unit Code (G,P,T,Y)	E Receiving Facility Handling Code
5	POLYCHLORINATED BIPHENYS	M002	10	G	S01
				<del></del>	

## Instructions:

- A. To identify your wastes, refer to your manifests. The description will usually be the U.S. DOT shipping name. Use a separate line for each type of waste. Number lines consecutively. Duplicate page as necessary.
- B. The EPA Waste Number (Block I. on the Uniform Manifest Form) can also be found in Massachusetts regulations, 310 CMR 30.120-30.136. The number will be a 4-digit code, beginning with a letter, followed by 3 numbers.
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- E. Receiving facility handling codes are found in Block K on the Uniform Manifest. This code will be a letter (S, T, or D), followed by 2 numbers.

## **EMERSON**& CUMING

Emerson & Cuming, Inc. A GRACE Ca

> Clean Harbors of Watick 5 Strathmore Road Watick, MA 01760

PURC	HASE ORDER NO	١.
2-	68731	
HIS NO. TO	O APPEAR ON ALL PACKA SPONDENCE PERTAINING	GES TO

SHIP & BILL TO THE LOCATION INDICATED BELOW	TAX EXEMPTION NUMBERS
869 WASHINGTON ST., CANTON, MA 02021	579364*0000*02-
59 WALPOLE ST., CANTON, MA 02021	**
10 RAMAH CIR., AGAWAM, MA 01001	,,
604 WEST 182nd ST., GARDENA, CA 90248	SROH B30-665644
3450 COMMERCIAL AVE., NORTHBROOK, IL 60062	1563-9266
1301 ELLIOT ST., TROY, MI 48083-4596	U22-231-2556
	<b>{</b>

PAYM	ENT TERMS	F.O.B.		TRANSPORT TER	MS			REQUI	REMENT DATE	
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В	l drus	e4.	Waste Oil N.O.S	s. (pump solu	tion) MATELO13	33			•	
С	1 Drus	ea.	Carbon sludge,	non-hazardou	s HAT E10134				•	
			All hazarouse of for disposal as all Federal, St	ed disposed o	f in accordance	20 W				
			Advise price to Tel: 828-3300,						·	
			Confi	irming						

Emerson & Cuming, Inc.

A GRACE Co.

## **RECEIVING SCHEDULE**

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## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING DIVISION OF HAZARDOUS WASTE

One Winter Street



GENERALOR-HALLED BY ISDE

Boston, Massachusetts 02108

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•	OLE STREET		B. State	Gen. ID	<b>~</b>	_
Generator's Phone (617 1828-3300 CAMEN.	MA. 02021			71 (	MIX	
. Haraporter	6. US EPA ID Number M   A   D   9   8   0   5   2   3	203	C.State	Trans. ID ABIGI SID	<b>211</b> 1	11 -
7. Transporter 2 Company Name	B, US EPA ID Number	1 1		sporter's Phone e Trans. ID	6176	55-88
Designated Facility Name and Site Address LEAN HARBORS OF NATICK INC	10. US EPA ID Number		11	1111	111	11.
CAN HARBORS OF MATICA INC				sporter's Phone ( e Facility, sID		quired
ATTICK, MA. 01760	M IA ID 19 I8 ID 15 I2 I3	צו מו כו		ility's Phone (	17 65	-886
		12. Conta	т.	13.	14.	
11. US DOT Description Including Proper Shipping Name, Hazard Cla	ass, and ID Number)	No.	Туре	Total Quantity	Unit Wt/Vol	Waste No.
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## TRANSMITTAL STATEMENT

to be mailed with the Annual Report

EMERSON & CUMING/W.R. GRACE	MAD000361709
Name of Installation	EPA Identification No.
Please check the appropriate response(s):	
1. XXX We are submitting the Annual Report as r	equired.
2. We are submitting Part 1 of the Annual R are required to complete Parts 2 or 3 fo	
We did not manifest any hazardous in Who Must File) but will retain Generator for possible future use	our status as a Large Quantity
We did not manifest hazardous was in Who Must File and would like t Small Quantity Generator,* or	
We did not manifest any hazardous as much as 20 kilograms of non-ac one month, at this address and re be withdrawn.*	utely hazardous waste in any
We moved our operation during 198	5 and are now located at:
New EPA Identification Number:	
We generate only waste oil.	

^{*} Companies requesting a change of status will be sent a Certification Statement to be completed. The change of status will be confirmed by DEQE in writing. Companies contemplating a move during 1986 should apply for a new EPA Identification Number and complete a Certification Statement to withdraw their existing ID prior to the move.

## ANNUAL HAZARDOUS WASTE REPORT

## PART 1

Part 1 of the Annual Report is to be completed by all responde	ents.
1. Current Status of Installation: (check where applicable)	(XXX) Generator
( ) Treatment, Storage, Disposal Facility ( ) Wastewater T	•
2. Reporting Year: Year ending 1985	Permitte
3. EPA Identification Number: MAD000361709	
4. Installation's Name: EMERSON & CUMING/ W.R. GRACE CO	
5. Installation's Address: 59 WALPOLE STREET	
CANTON, MA. 02021	
6. Installation Contact: J.J. COHENNO/R.M. OLSON Tel. No.: 82	28-3300
7. Does your installation discharge process wastewater? or or	ATTAC'II MAILING LABEL  IF INCORRECT
(b) Groundwater discharge permit or	\ \ \
(c) Name of municipal sewerage system	
Is the wastewater considered hazardous prior to processin  Yes No (If yes, complete Part 3, line 16.)	g?
8. Is your installation registered with the Division of Air	Quality Control?
Yes No (For verification, contact your DEQE R	egional office.)
9. Transportation Services Used: (list name and EPA ID numbe	r of each)
CLEAN HARBORS OF NATICK - MAD980523203	
· · · · · · · · · · · · · · · · · · ·	
10. Certification:	
Lertify under penalty of law that I have personally examined and am familiar with the information attached documents, and that based on my inquiry of those individuals immediately responsible for o that the submitted information is true, accurate, and complete. I am aware that there are signific information, including the possibility of fine and imprisonment.	higining the information. I believe
In addition, I understand that any material supplied with this application will not be considered co requested that such material be kept confidential and the Department has made a determination of con CMR 3.00. Regulations Governing Access to and Confidentiality of Department Records and F. Management. Acc.	fidentiality in accordance with 310
John Contiano	1/12/26
Alphorized Agnature of Owner, Operator or Designated Official	Date Signed
TOURL I COHENNO SHIPPIN	G SUPERVISOR

Inte of Person Stening

" 143

__JOHN J. COHENNO

Print or Type Name

## GENERATOR ANNUAL REPORT

To complete this part of the report, refer to all your manifests for the calendar year. Separate your manifests by receiving facility.

- 11. Generator's EPA Identification Number: MADOOO361709
- 12. Waste Shipped Off-Site: (Complete a separate page for each facility to which waste was shipped. Reproduce additional pages as necessary.)
  - a) Name of Receiving Facility: CLEAN HARBORS OF NATICK INC
  - b) Facility EPA ID Number: MAD980523203
  - c) Facility Address: 10 MERCER ROAD NATICK, MA. 01760

    (Street or P.O. Box) (City) (State)

(If the waste was exported to a foreign country, enter Waste Exported on line b. and identify the U.S. border point of departure in Comments, line 13.)

Line Number	A Description of Waste	B EPA Waste Number	C Quantity of Waste	D Unit Code (G,P,T,Y)	E Receiving Facility Handling Code
1.	METHYLENE CHLORIDE	F002	6105	G	S01
2.	OIL, N.O.S.	M001	55	G	S01

## Instructions:

- A. To identify your wastes, refer to your manifests. The description will usually be the U.S. DOT shipping name. Use a separate line for each type of waste.

  Number lines consecutively. Duplicate page as necessary.
- B. The EPA Waste Number (Block I. on the Uniform Manifest Form) can also be found in Massachusetts regulations, 310 CMR 30.120-30.136. The number will be a 4-digit code, beginning with a letter, followed by 3 numbers.
- C. Enter the total amount of this particular waste which was shipped to this facility during the calendar year.
- D. The unit codes are: G gallons; P pounds; T tons; Y cubic yards.

  If you shipped waste in 55 gal. drums, multiply number of drums by 55, enter
- E. Receiving facility handling codes are found in Block K on the Uniform Manager This code will be a letter (S. T. or D., followed by 2 numbers.

Gene	rato	r's EFA Identification Number: MAD000361709
13.	Com	ments (refer to line number): Use this space to explain any entry in (12).
14.		te Reduction and On-Site Recovery by Generator (required for recycling mittees):
	the the	ifests from large quantity generators must contain a certification that volume and/or quantity and toxicity of the waste have been reduced to maximum degree economically practicable and the method used to manage waste minimizes risk to the extent practicable.
	A.	Type of activity: (Check where appropriate)
		1) Treatment as an integral part of the manufacturing process XXX (as defined in Mass. regulations, 310 CMR 30.010)
		2) Recycling by permit (as defined in 310 CMR 30.143).
		3) Oil and water separation (as defined in 310 CMR 30.202:10)
		<ol> <li>Other (please specify, for example, substitution, process modification, sludge reduction, etc.)</li> </ol>
		PROCESS MODIFICATION TO REDUCE GENERATION
	в.	Amount: (estimated annual quantity)
	۵.	
		1) Total waste entered for processing: APPROX. 1200 gallons
-		2) Total amount of product: APPROX. 600 () gallons
	c.	Description of waste and process:
		DISTILLATION OF METHYLENE CHLORIDE/EPOXY SLUDGE. DISTILLED MCL REUSED. STILL BOTTOM EPOXY SLUDGE DISPOSED AS HAZARDOUS WASTE.

If you have more than one recovered or reduced material, duplicate this page for each.



# The Commonwealth of Massachusetts Executive Office of Environmental Affairs Department of Environmental Quality Engineering Division of Solid and Hazardous Waste One Winter Street, Boston, Mass. 02108

December 31, 1985

Dear Generator or Operator of a Hazardous Waste Facility:

An annual report of your 1985 hazardous waste activity must be received by the Department no later than March 1, 1986. Failure to comply with this reporting requirement may result in enforcement action.

I encourage you to examine carefully the instructions and the transmittal statement to determine the portions of the report which your company should submit.

Hazardous waste regulations, amended through July, 1985, (310 CMR 30.000) can be obtained at the State House Bookstore, Room 116 at the State House, Boston, 02133, or by telephoning (617) 727-2834.

Your cooperation is greatly appreciated.

Very truly yours,

William F. Cass Director

WFC/nw

Enclosure: Annual Report for 1985

### GENERAL INSTRUCTIONS

## ANNUAL HAZARDOUS WASTE REPORT

## WHO MUST FILE

O Large Quantity Generators, defined as those

who generate in a month more than

- 1,000 kilograms of non-acutely hazardous waste; or
- 1 kilogram of acutely hazardous waste; or
- 10 kilograms of inner liners from hazardous waste containers; or
- 100 kilograms of any residue resulting from an acutely hazardous spill; or
- any amount of polychlorinated byphenyl (PCB) wastes in concentrations of 50 ppm or greater; or

who accumulated more than these amounts at any one time during the year.

You must submit a written response if you notified EPA as a Generator, even if your activity during this reporting year was less than these amounts.

- O Facilities which are authorized to treat, store, or dispose of hazardous waste generated on-site. (Facilities which receive any hazardous waste from an off-site source are required to file monthly reports and are exempt from all Annual Report requirements.)
- Owners/operators of wastewater treatment units (as defined in Massachusetts regulations, 310 CMR 30.605).
- O Installations which have permits for recycling (as defined in 310 CMR 30.143).

## WHEN YOU MUST FILE

The Annual Report is due at the Department of Environmental Quality Engineering no later than March 1st for the previous calendar year's hazardous waste activity(ies).

## WHAT TO FILE

- PART 1 Identification and Certification: completed by all filers
- PART 2 Summary of Wastes Shipped and Recycled or Reduced: completed by Generators and Recyclers
- PART 3 Summary of Wastes Treated, Stored or Disposed on site: completed by authorized facilities and wastewater treatment units

You may request that any information, records, or particular part thereof be kept confidential and not considered to be public record, when such information, record, or report relates to secret processes, methods of manufacture, or production and, if made public, would divulge a trade secret.

## WHERE TO FILE

Mail the Annual Report with the Transmittal Statement to:

Compliance Branch
DEQE - Division of Solid & Hazardous Waste
One Winter Street
Boston, Massachusetts 02108

om til frættigt og formeren 1966 og statiske og Gefort Marija og kommen er skalende en eg	June 1, 1984			July 11, 1984		
Sample:	A	<u>B</u>		<u>C</u>	D	<u>E</u>
Test			· .			
BOD (mg/1)	<b>∠</b> 5	<b>~</b> 2		<b>&lt;</b> 2	<b>4</b> 1	<b>&lt;</b> 2
COD (mg/1)	27	21	. **	20	5.5	22
рн	6.4	6.7		7.2	6.6	7.2
Ammonia (mg/l)	0.25	0.12		0.26	0.25	0.12
Total Suspend Solids (mg/l)	6	9	• • • • • • • • • • • • • • • • • • • •	39	<del>-</del>	25
Silver (mg/l)	0.02	0.02		< 0.02	<0.02	<0.0:
Nickle (mg/l)	0.05	< 0.02		< 0.02	<0.02	<0.01
Lead (mg/1)	0.05	0.05		< 0.25	<b>∠</b> 0.25	<b>∠</b> 0.2!
Total Organic Carbon (mg/l)	<b>∠</b> 10	∠10	:	13	6.5	11
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Toluene (/g/l)*	_	_		-	-	_
Dichloroethane (/g/1)*	-	21		-	_	· <u>-</u>

A= Taken at non contact cooling water & ground water collection sump.

B= Taken at raceway discharge to river.

C= Taken at pond above plant (river spillway).

D= Taken at non contact cooling water & ground water collection sump.

E= Taken at raceway discharge to river.

* Detection threshold limits were 5 / g/l (5 pph)

REDACTED - CONFIDENTIAL BUSINESS INFORMATION



One Center Plaza Boston, Massachusetts 02108 617 742-5151

January 25, 1983

Mr. Randolph Olson Emerson & Cuming Dewey & Almy Chemical Division W. R. Grace & Company 59 Walpole Street. Canton, Massachusetts 02021

Dear Mr. Olson:

In accordance with your Purchase Order No. 2-42521, Camp Dresser & McKee is pleased to submit six (6) copies of the enclosed final report entitled "Spill Control Audit, Emerson & Cuming Plant No. 2". We have made a number of changes to the draft in response to your January 24, 1983 discussion with Jaret Johnson of our staff.

For ease in future reference, we have letter-coded, in the margin, each of our text recommendations.

Two items that have been deleted from the previous draft merit your attention. First, while CDM understands Emerson & Cuming's reluctance to raise the issue of-sampling with DEQE, we do recommend sampling of the lower raceway discharge so that you will know its quality. Second, we wish to emphasize that state and federal regulations are the basis for the recommendations in our report. Deletion of Section VII removes from the report the recognition of that basis.

Please contact me, Jaret Johnson or Robert Dangel if you have further questions on the enclosed report.

Very truly yours,

CAMP DRESSER & McKEE INC.

Edward B. Fitzpatrick

Associate

EBF/JCJ/m

**Enclosures** 



DENTIFICATION INFORMATION

# ALABAMA HAZARDOUS WASTE MANIFEST

**CWMA** 

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### **GRACE MEMO**

to: Distribution

date: July 17, 1985

from: Muhammad R. Ahsan

C Paul Drury Rick Winterson

subject: Hazardous Waste Management System
And Contingency Plan.

Attached is a copy of the Hazardous Waste Management System for Emerson & Cuming Inc., (Plant 2) Canton, Mass.

Please be sure to comply with all federal, state and local regulations when handling and disposing of the hazardous waste. These regulations are defined by EPA under CFR 40 Part 261 and by the Commonwealth of Massachusetts under 310 CMR 30-100.

It also includes the Contingency Plan and Emergency Procedures for this facility.

If you have any questions, please contact me.

#### Distribution:

John J. Cohenno John S. Colageo Tim Cummings Randy M. Olson Randy P. Porter

Mohammad

MA/pldc:

#### HAZARDOUS WASTE MANAGEMENT SYSTEM

-EPA I.D. NO. MAD 000361709-

EMERSON & CUMING, INC.

A Subsidiary of W. R. GRACE CO. 59 Walpole Street Canton, MA 02021 -PLANT #2-

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## Hazardous Waste Management System General (40 CFR Part 262)

#### PURPOSE & SCOPE

#### Subpart A 262.10-12:

The Resource Conservation and Recovery Act (RCRA) of 1976, created a Federal Regulatory Program for handling hazardous wastes.

The Act encourages States to create Waste Regulatory Programs, reserving to E.P.A., the regulation of hazardous waste, until State programs are approved. The company must file notices and permit applications with the E.P.A., or State for the storage, treatment and disposal sites it operates, and identify any hazardous waste it generates.

This part provides definitions of terms, general standards, and overview information applicable to Hazardous Waste Management system.

#### Applicability:

The W. R. Grace & Co., Emerson & Cuming, Inc., Canton, Massachusetts facility is a registered generator of hazardous waste.

#### Hazardous Waste Determination:

Some of the waste generated by the facility is hazardous waste. The waste is not analyzed for each unit generated but is segregated according to the chemicals involved and processed as hazardous waste according to the category as generated at this facility.

#### E.P.A. Identification Number:

The Canton facility (Plant #2) E.P.A. Identification Number is MAD 000361709.

#### GENERAL REQUIREMENTS

Environmental Protection Agency (E.P.A.) has exempted "small quantity generators" from hazardous waste regulations.

"Small Quantity Generators" are those generating <u>less than 1000 kilograms</u> per month of hazardous waste.

Generators that transport, or offer for transportation, hazardous waste for off-site treatment, storage, or disposal must prepare a manifest before transporting the waste off-stie.

The generator must package, label and mark hazardous wastes in accordance with U. S. Department of Transportation (D.O.T.) regulations. The generator must also placard, or offer placards, as specified in D.O.T. regulations.

#### GENERAL WASTE ANALYSIS

(265.13)

Waste placed in storage will be generated on the premises. The composition of this waste will be known based on the chemicals used and analysis of the waste is not required.

When the composition of a waste product is not known, it will be the responsibility of the Plant Hazardous Waste Coordinator to obtain a representative sample and have that sample analyzed to determine its hazardous classification. The Plant Hazardous Waste Coordinator will maintain a record of such sampling and the results of the analysis.

When the composition of the waste is known, the generating department will fill out a 'WASTE PROFILE SHEET', (copy attached),or 'REQUEST FOR TRANSFER OF CHEMICAL WASTE', and submit to the Shipping and Receiving Department for storage in a designated Hazardous Waste Storage Area.

#### THE MANIFEST

(Subpart B 262.20)

The manifest must contain, among other things, the following items:

- 1) Generator's Name,
- 2) Generator's Address,
- 3) Generator's E.P.A. Identification Number,
- 4) The name and Identification Number of each transporter,
- 5) The name, address and E.P.A. Identification Number of the designated facility.

Manifests are prepared according to the requirements. This is done by the Plant Hazardous Waste Coordinator (John Cohenno). Copies are retained in the Shipping/Receiving Department for, at least, three (3) years.

#### PRE-TRANSPORT REQUIREMENTS

(Subpart C 262.30-34)

#### Packaging:

Hazardous wastes are packaged in accordance with the Department of Transportation (DOT) regulations. The wastes are packed in DOT approved drums (17E or 17H), according to 49 CFR 173.119.

#### Labelling & Marking:

The appropriate DOT labels and markings are affixed to each container or package, (copy attached).

#### Placarding:

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Placards are available in the Shipping & Receiving Office and are available to the transporter, if not already affixed.

#### Accumulation Time:

The Canton facility has generator status, only. The hazardous waste will be removed from the site ninety (90) days after it is generated, or sooner.

#### RECORDKEEPING AND REPORTING

(Subpart D 262.40-42)

#### Recordkeeping:

The Plant Hazardous Waste Coordinator keeps manifests and annual reports in his file for, at least, three (3) years.

#### Annual Reports:

One annual report as a generator, is submitted yearly. The report contains the amount of hazardous waste generated, shipped and stored on-site, etc.

#### Exception Report:

The manifest copy is received within thirty (30) days after the waste has been shipped.

If the copy has not been received within forty-five (45) days, the Plant Hazardous Waste Coordinator will file an exception report, if needed.

#### TREATMENT, STORAGE & DISPOSAL (TSD) FACILITY REQUIREMENTS

(40 CFR PART 265)

The Canton facility does not store the hazardous waste it generates for longer than 90 days. Therefore, the facility has a generator only status.

The hazardous waste is shipped according to DOT regulations to Clean Harbor, Inc., a permitted disposal facility at Natick, Massachusetts (MAD #980523203), and at Braintree, Massachusetts (MAD #053452637).

The Canton facility maintains the hazardous waste storage area adjacent to the Shipping & Receiving office, where flammables such as organic solvents, or other hazardous materials are also stored.

The empty drum must be labelled with the accumulation start date and name of chemical waste to be accumulated in the container. The compatible wastes can be placed into the same container. When full, the manufacturing personnel will properly close the drum and complete a Waste Profile Sheet/Chemical Waste Transfer form. The "generation" date will be marked on the drum label and the profile sheet upon being full and capped. The completed Waste Profile Sheet will be submitted to the Shipping and Receiving Supervisor who will arrange the transfer of hazardous waste container(s) from the manufacturing to the hazardous waste storage area, and prepare for proper disposal off-site.

#### GENERAL INSPECTION

(265.15)

The facility's hazardous waste/materials storage area is inspected once a week for the following:

- 1) Any spills, bulged drums, leaking containers, etc. If a container holding hazardous waste, or material is not in good condition, or if it begins to leak, the inspecting personnel must transfer the waste to a container in good condition. Any spill, or leak, must be cleaned up using proper absorbing material, and contaminated material must be placed in a (open head) DOT approved drum for proper disposal off-site. A recovery drum should be used, if necessary.
- 2) To prevent waste cross contamination, hazardous waste must be segregated according to type.
- 3) For the presence and availability of shovels, absorbent, and empty or recovery drums.
- 4) For the presence and availability of all types of necessary protective appartus.

Personnel designated to make the above inspections will maintain a record log of inspections. The log will be retained in the Plant Hazardous Waste Coodinator's office for, at least, three (3) years.

The inspection log will record any remedial actions which have been taken.

#### Designated Inspection Personnel:

- 1. John Cohenno, Plant Hazardous Waste Coordinator
- 2. Frank Helmuth, Shipping & Receiving Department
- 3. Charles Moore, Jr., Shipping & Receiving Department

#### PERSONNEL TRAINING

The personnel involved in hazardous waste handling are as follows:

John Cohenno

Plant Hazardous Waste Coordinator Shipping & Receiving Supervisor Experience Seminar

Michael Sommers

Charles Moore

Fronk Hellmuth

John Cohemo is thoroughly familiar with the Canton facility and with the hazardous waste storage area. He inspects the storage area on a regular basis to ensure safe practices are being followed.

In addition, the following personnel have been trained, in-house, for handling hazardous waste to ensure their own safety, the safety of their fellow employees, and to respond to emergencies as well as to maintain our compliance with EPA and DEQE regulations.

#### Waste Handlers

Steve Gaffney
Paul Scanlon
John Cohenno
Frank Hellmuth
Charles Moore, Jr.
Michael Sommers

#### Fork Lift Drivers

Paul Scanlon Michael Sommers Charles Moore, Jr.

These individuals have been instructed in the safe handling and loading of hazardous waste. The purpose of this training is to minimize hazards to human health, or the environment from fires, explosions, or any unplanned release of hazardous waste, or waste constituents into the air, soil, or surface water.

#### In-House Training:

- a. Emergency procedures for fire or explosion are-posted throughout the facility. For response to fire or explosion, refer to Fire Plan attached.
- b. The regular pick up provided by the hazardous waste contractors occurs at least every ninety (90) days.

- c. No employees are permitted to perform unsupervised duties in handling hazardous waste without the required training.
- d. The new employees get on-the-job training before they start handling hazardous wastes.
- e. Procedures for handling hazardous wastes are reviewed with operating personnel, as needed.

Shipping and Receiving Department personnel will prepare hazardous waste for off-site disposal. Their duties are as follows:

- 1. Maintain a log of waste (Waste Profile Sheet), submitted for disposal.
- 2. Maintain a supply of appropriate labels, etc., and apply proper labels and placards on waste containers.
- 3. Prepare Manifest for waste. Maintain file for shipping copies and copies returned by transporter.
- 4. Contact disposal contractor for removal of waste.
- 5. Maintain clean and safe housekeeping.
- 6. Keep supply of absorbent for emergency spills.
- 7. Inspection of hazardous waste storage area for spills, leaks, etc.
- 8. Maintain and retain the documents as required by regulatory agencies.

The waste handlers have further been instructed in their duties that ensure their own safety and the facility's compliance to the regulations. Personnel training also includes, but is not limited to the following:

- A. Identification of waste hazardous class.
- $^{\mathrm{B}} \cdot$  How to store waste.
- C. Protection from fire or explosion and violent-reaction.
- D. Use and inspection of necessary protective apparatus.
- E. Familiarization with CFR 40, CFR 49, Emerson & Cuming waste, DOT containers, and Waste Profile Sheets, etc.

#### EMERGENCY COORDINATORS

Name	Title	Extension		
Randy M. Olson	Plant Manager	•••	<b>#</b> 330	
-John-Colageo	Safety Coordinator	•••	<b>#</b> 377	
John Cohenno	Plant Hazardous Waste Coordinator	•••	#357	

These individuals are thoroughly familiar with the Canton facility and with the hazardous waste storage area.

### ALTERNATE CONTACTS:

- Muhammad Ahsan	Process/Environmental Engineer	#346
Randy Porter	Production Supervisor	#376
Stan Brooks	Assistant Production Supervisor	#369

# GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTE

(265.17)

Ignitable and reactive wastes are stored in an area designed for storage of flammable materials.

The entire hazardous waste storage area is explosion proof, and is designed for storage of flammable, ignitable, reactive, or incompatible materials and wastes.

All appropriate precautions have been taken to ensure that waste is protected from heat, sparks and open flames. The storage room is equipped with ventilation, sprinklers, and portable fire extinguisher.

#### PREPAREDNESS AND PREVENTION

(Subpart C 265.30-34)

#### MAINTENANCE AND OPERATION OF THE FACILITY:

The designated hazardous waste/material storage area is maintained to minimize the possibility of a fire or release of stored materials to the air, soil, or surface water which could threaten human health or environment. Any discrepancies, noted between weekly inspections will be reported to Emergency Coordinator.

#### REQUIRED EQUIPMENT:

The following equipment/supplies are located in or adjacent to the hazardous waste/materials storage area:

- a. Fire Extinguisher
- b. Absorbent in bags
- c. DOT approved Transfer/Recovery drums (open/closed head)
- d. Shovels
- e. Necessary safety apparatus.

#### TESTING & MAINTENANCE OF EQUIPMENT:

- a. Fire Extinguishers are checked monthly, but outside contractor checks the equipment every six month for complete services.
- b. Absorbent material bags are checked at each weekly inspection.
- c. Drums and safety apparatus are checked on weekly basis.
- d. Outside fire hose connections will be checked visually for damage to threads and corrosion.

#### ACCESS TO COMMUNICATION OR ALARM SYSTEM:

In case of emergency, coordinate or alternate will take the necessary steps and contact the appropriate emergency agencies as needed.

1.	Mr. James A. Fitzpatrick, Canton Fire Department	828-1313/828-1314
2.	Mr. Joseph Buckley, Canton Police Department	828-1212
3.	Hospitals: Norwood Hospital Goddard Hospital, Stoughton Poison Information Center, Boston	

#### 4. Doctors:

Dr.	Batchelder-General	•••••	828-2515
Dr.	Violin-Eyes	••••••	762-9018

## REQUIRED AISLE SPACE:

Materials will not be stored in the immediate vicinity outside of the hazardous waste storage area. The entrance door and the space around the hazardous waste area shall be kept unobstructed at all times.

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#### ARRANGEMENT WITH LOCAL AUTHORITIES

(265.37)

Emerson & Cuming, Inc., facility is in the process of sending letters to the Town of Canton Fire and Police Departments, and a copy of these standards will be offered to them.

The Fire, Police and Rescue Squad will be informed of the hazardous wastes/materials (list attached) stored here, and precautions necessary in responding to any emergency. These agencies are familiar with the facility, access to the facility, emergency procedures, and layout of the facility.

#### CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(Subpart D)

#### PURPOSE AND IMPLEMENTATION OF CONTINGENCY PLAN

(265.51)

The Canton facility stores its hazardous chemical waste/materials in an explosion proof room located within the warehouse/shipping and receiving building.

There are two situations that could occur in our hazardous waste/materials storage area, and possibly threaten health or the environment. One is fire or explosion, the other is a spill resulting from a leaking drum. The contingency plan is designed to describe emergency procedures in handling both these events.

# RESOURCE CONSERVATION RECOVERY ACT (RCRA) CONTINGENCY PLAN

EMERSON & CUMING, INC. Division of W. R. Grace & Co.

59 Walpole Street Canton, MA 02021 (617) 828-3300

EPA Facility No. MAD 000361709

#### EMERGENCY COORDINATORS

John Cohenno ......... Plant Hazardous Waste Coordinator

Extension #357 Home: #344-2874

Randy Olson ......... Plant Manager

Extension #330 Home: #545-3288

#### ALTERNATE CONTACTS

(E.

Randy Porter ...... Production Supervisor

Extension 376

Home: #1-585-4286

John Colageo ...... Safety Coordinator

Extension #377 Home: #784-6428

The Canton facility maintains the hazardous waste/materials storage area in an explosion proof room, located in the Shipping & Receiving area adjacent to Walpole Street. The hazardous wastes/materials are stored in DOT approved, 55 gallon, steel drums.

#### EMERGENCY PLAN FOR ACCIDENTAL SPILLS

In the building where hazardous waste is stored, containers of flammables such as organic solvents are also stored. The largest container in the building is a 55-gallon drum. The magnitude of the largest anticipated accidental spill would be approximately fifty (50) gallons. The following provisions have been made to handle such an emergency.

Laboratory tests (see Memo dated December 31, 1980), have shown that 150 lbs. (12 bags) of Vermiculite will absorb fifty (50) gallons of solvent. Accordingly, a reasonable supply of Vermiculite will be maintained in hazardous waste/solvent materials storage area. Two (2) large shovels are available which can be used to pick up the contaminated absorbing material. The plan also calls for the availability of empty open-head, 55 gallon drums, or recovery drums which can be used to contain the absorbent and waste/solvent etc.

A self-contained breathing apparatus is on hand in the nearby Maintenance Supervisor's office.

The employees in the Shipping & Receiving area, are familiar with emergency procedures in case of an accidental spill.

#### EMERGENCY PLAN FOR ACCIDENTAL SPILLS

In the building where hazardous waste is stored, containers of flammables such as organic solvents are also stored. The largest container in the building is a 55-gallon drum. The magnitude of the largest anticipated accidental spill would be approximately fifty (50) gallons. The following provisions have been made to handle such an emergency.

Laboratory tests (see Memo dated December 31, 1980), have shown that 150 lbs. (12 bags) of Vermiculite will absorb fifty (50) gallons of solvent. Accordingly, a reasonable supply of Vermiculite will be maintained in hazardous waste/solvent materials storage area. Two (2) large shovels are available which can be used to pick up the contaminated absorbing material. The plan also calls for the availability of empty open-head, 55 gallon drums, or recovery drums which can be used to contain the absorbent and waste/solvent etc.

A self-contained breathing apparatus is on hand in the nearby Maintenance Supervisor's office.

The employees in the Shipping & Receiving area, are familiar with emergency procedures in case of an accidental spill.

#### MANIFEST RECORDKEEPING AND REPORTING

(Subpart E 265.71-77)

#### Use of Manifest System:

The facility stores only that waste which is generated on site, hence this section is not applicable.

#### Operating Record:

A log is kept in Shipping & Receiving Supervisor's office of each delivery of hazardous waste to the storage area. This consists of the following entries: (See Waste Profile Sheet)

Date
DOT - Proper shipping name
EPA name
Amount of waste
Department

All waste is stored in drums and in the same area. Records, reports, etc., discussed in previous sections.

## Ground Water Monitoring:

(Subpart F)

Not applicable

#### CLOSURE AND POSTCLOSURE

(Subpart G 265. 111, 112, 117)

#### Closure Performance Standard:

If this facility is moved to another location or the hazardous waste storage activity is closed, all packaged hazardous waste will be removed and the storage area cleaned to remove all traces of hazardous wastes.

#### Closure Plan:

(

The hazardous waste storage portion of the facility will close if:-

- 1. The facility closes,
  - 2. It becomes unnecessary, or unfeasible to store hazardous waste.

In either case, closure of the hazardous waste storage activity would involve arranging for disposal of the hazardous waste stored.

Because the hazardous waste is stored indoors in drums, the only testing or monitoring that could be done is to assure that all the waste has been completely removed from the facility.

The only decontamination step needed would be washing of the floor of the hazardous waste storage area to remove any material that has been spilled and had gone unnoticed during the storage period.

If the operation closes completely, the hazardous waste must be removed thirty (30) days prior to the last days of operation of the Canton facility. The facility supervisor must submit this closure plan to the EPA Regional Administrator. After the closure plan has been approved, the Plant Hazardous Waste Coordinator will:-

- 3. Prepare all drums of hazardous waste for disposal by an approved disposal contractor,
- 4. Clean by washing scrubbing with soap and water, the floor of the hazardous waste storage area. Any residue must also be disposed of as a hazardous waste.
- 5. When closure is completed, the Emerson & Cuming, Inc., representative and an independent, registered professional engineer must notify the EPA Regional Administrator.

#### PostClosure Plan:

Because of the limited nature of this facility's hazardous waste activity, storage of from fifteen to twenty-five (15-25) 55-gallon drums, a post-closure plan is not necessary. After the hazardous waste is shipped to a disposal facility, and the floor of the storage area is cleaned, there will be no residual hazardous waste to monitor.

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#### FINANCIAL REQUIREMENTS

(Subpart H 265.142)

-Plant #2-

### Cost Estimate for Facility Closure:

The cost of shipping a typical ninety (90) day collection of hazardous waste stored in the storage area is about \$5500.00 (Fifty-five Hundred Dollars).

The maximum cost would be as follows:

Ship 90 day accumulation of t	nazardous	waste -	\$5,500.00
Floor cleaning-washing	400.00		
Closure certification by regi Professional Engineer	istered		150.00
Contingency	Total	•••••	700.00 \$6,750.00

#### USE AND MANAGEMENT OF CONTAINERS

(Subpart I 265.171-174)

#### Condition of Containers:

The hazardous waste containers must be in good condition. The containers are inspected for leaks and bulges on a weekly basis.

#### Compatibility of Waste with Containers: ;

Hazardous waste is stored in the container in which it will, ultimately, be shipped; hence, the containers comply with DOT regulations.

#### Management of Containers:

Containers are kept closed during storage and are handled carefully to minimize damage to the container.

#### Inspections:

Inspections are conducted weekly. A log of findings and remedial actions is maintained.

#### APPENDIX I -- CONTINGENCY PLAN

### EMERGENCY COORDINATORS NAMES, TITLES, ADDRESSES & TELEPHONE NUMBERS:

Randolph M. Olson Plant Manager .... Plant Ext. #330 447 First Parish Road Scituate, Mass. 02066 Res: #545-3288

Randolph P. Porter Production Supervisor .... Plant Ext. #376 34 Winthrop Street Kingston, Mass. 02364 Res: #1-585-4286

John J. Cohenno Plant Haz. Waste Coordinator .. Plant Ext. #357 94 Rockland Street Stoughton, Mass. 02072 Res: #344-2874

John F. Golageo Safety Coordinator .... Plant Ext. #377 60 Pleasant Street Sharon, Mass. 02067 Res: #784-6428

Muhammad Ahsan Tech.-Envir. Coordinator .... Plant Ext. #346 11 Canal Street

Billerica, Mass. 01821 Res: #1-663-4616

Rudolph S. (Stan) Brooks Ass't. Prod. Supervisor Plant Ext. #369 64-A Endicott Street Canton, Mass. 02021 Res: #828-6857

All chemical spills from storage, or use areas, do not constitute an immediate hazard or emergency because the environment (ground, water) has been protected against contamination from spills. The only real emergency situation would come about in the event of fire.

Most of our liquid chemicals will burn and emit toxic fumes; however, most of these chemicals will not sustain combusion unless they reach their elevated flash points.

If a fire does arise, the plant's alarm system can be set off in two (2) different ways. First, if and when the sprinkler system goes off, a flow switch in the sprinkler riser automatically sets off a CODED ALARM throughout the plant and at the fire station. Manual pull-stations can also be tripped to turn in a fire alarm. The Alarm Code tells the approximate location of the fire within the plant. An amunciator located next to the firebox at the front of the plant will visually display where an alarm has been tripped in the plant.

ONCE A FIRE LOCATION IS KNOWN, OUR PLANT MAP OF HAZARDOUS WASTE/MATERIALS CAN BE CHECKED TO SEE IF ANY CHEMICALS MAY BE IN THE AREA.

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Hazard Codes and Material Safety Data Sheets (MSDS), can be referred to for specific information but, in general, most of the liquid chemicals have flash points above 200° F.

For large fires in which the drums may be heated to their flash points, cooling the drum with a fire hose is, normally, a good course of action.

All personnel have been instructed to evacaute the building when a fire alarm is triggered. The Alarm Codes allow personnel to know where the fire is located so they will not exit in that direction. All areas have two (2) or more exits from which to escape. Individual departments have their local exit routes posted as well as all points which exit from the entire building.

The facility floor plans are posted on every floor indicating the locations of the following:

- a. Exit Doors,
  - b. Fire Extinguishers,
  - c. Fire Alarms,
  - d. Protective Safety-Apparatus,
  - e. Telephone,
  - f. Hazardous Waste-Materials Storage Area, and
  - g. Hazard Codes.

The Contingency Plan includes the layout of the facility, properties and hazards of wastes-materials, working areas, roads in and around the facility, and the home telephone numbers and addresses of the Emergency Coordinators.

In addition, each of the following individuals have been invited to visit our facility:

Mr. James A. Fitzpatrick, Fire Chief Town of Canton Fire Department	•••••	#828-1313	(Bus.	Hours)
Mr. Joseph Buckley, Police Chief Town of Canton Police Department	• • • • • • • •	#828-1212	(Bus.	Hours)
Mr. Warren Rutherford, Executive Secretary Town of Canton Board of Selectmen	7	#828-0184	(Bus.	Hours)
Mr. Patrick Maloney, Health Agent Town of Canton Board of Health	•••••	#828-0615	(Bus.	Hours)
Mr. Bruce Komiske, Administrator Norwood Hospital, Norwood	• • • • • •	<b>#</b> 769-4060	(Bus.	Hours)

#### APPENDIX II

#### DESIGNATED EMERGENCY PERSONNEL

Randy Olson

- Plant Manager

John Cohenno

- Plant Hazardous Waste Coordinator

John Colageo

- Safety Coordinator

The above-named personnel will be instructed in responding to leaks, spills and/or fire situations. They will, also, be instructed in the proper handling and securing of drums, pails, etc., in preparation of moving and storing hazardous chemical waste prior to removal by a licensed hauler.

#### Emergency Procedures:

- a. Leaking drums, etc., will be detected during weekly inspections. Designated personnel will clean up the spill(s) by using any absorbent and the contaminated absorbing material will be placed in a DOT approved drum for proper disposal off-site. Further, the remaining contents of the leaking drum(s) will be transferred to another DOT approved drum.
- b. Fire in any container in the storage area or anywhere within the plant:

The Security Guard, designated personnel, or any person detecting the ignition will respond as follows:

- 1. During normal working hours:
  - Call Emerson & Cuming, Inc., Switchboard IMMEDIATELY and tell Switchboard Operator the nature of emergency.

    The Telephone operator will call Canton Fire Dept. #828-1313.
- 2. Designated personnel will stand by the Main Gate on Neponset Street to await the arrival of the Canton Fire Dept., to direct them to the scene. The Fire and Police Departments will have access to the plant property during this emergency.
- 3. The Switchboard Operator shall call the Canton Police Department #828-1212, after notifying the Canton Fire Department.
- 4. The Switchboard Operator and employees detecting the fire will notify the other employees in the plant.
- 5. During off hours, weekends, Holidays, the reporting of a fire to the appropriate Emergency agencies will be the responsibility of the Maintenance Department.

EMERGENCY COORDINATORS SHOULD BE NOTIFIED ALSO.

6. The notification of a fire to plant personnel will be done in a quiet and orderly manner to prevent panic and keep disorder to a minimum.

- 7. Security personnel stationed at the gates will direct nearby everyone to stay clear of the area.
- 8. After the fire is out the emergency personnel will direct the clean up, repackaging and arrange for plant security to the affected area.
- 9. All plant personnel will gather in a pre-designated area during such emergency.

APPENDIX III - (i) DOT LABELS & MARKINGS CORROSIVE (}) POISON

# HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

MANIFEST #					
D.O.T.SHIPPING NAME					
UN OR NA#		•			
EPA NAME					
EPA #	<del></del>				
GENERATOR INFORMATIO	N:				
NAME	· · · · · · · · · · · · · · · · · · ·				
ADDRESS					
CITY	STATE	ZIP			
DATE OF GENERATION/ACCUMULA	TION		<del></del>		

# HAZARDOUS WASTE PROFILE SHEET

Physical State
SolidLiquid
SemisolidOther_
Specific Gravity
Boiling PointPH_
Flash Point
Vapor Pressure
_Other
TimeOther
s Characteristics
Corrosive
eCombustible
icOther
D.O.T. Hazardous Yes
R.Q
/Cu YdOther
Other
•

#### APPENDIX III--- (iii)

### INSPECTION LOG SHEET

DATE	TIME	FINDINGS	REMEDIAL ACTIONS	INSPECTED BY
			·	
·	·			
	i		<u>.</u>	
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-282

# **HAZARD CODES**

1 - Mild Hazard

- 2 Moderate Hazard
- 3 Severe Hazard
- **V** Vapors can be respiratory irritants or otherwise toxic.
- **D** Dust can be a respiratory irritant or otherwise toxic.
- F1 Flash point greater than 200°F (ignitable liquid).
- **F2** Flash point 100°F-200°F (combustible liquid).
- **F3** Flash point less than 100°F (flammable liquid).
  - I Skin and eye irritant.
  - **C** Corrosive.
  - **E** Explosive.
  - **S** Sensitizer.
  - X Special Hazard.See formula for instructions.

# RAW MATERIALS & CHEMICALS LIST @ PLANT #2

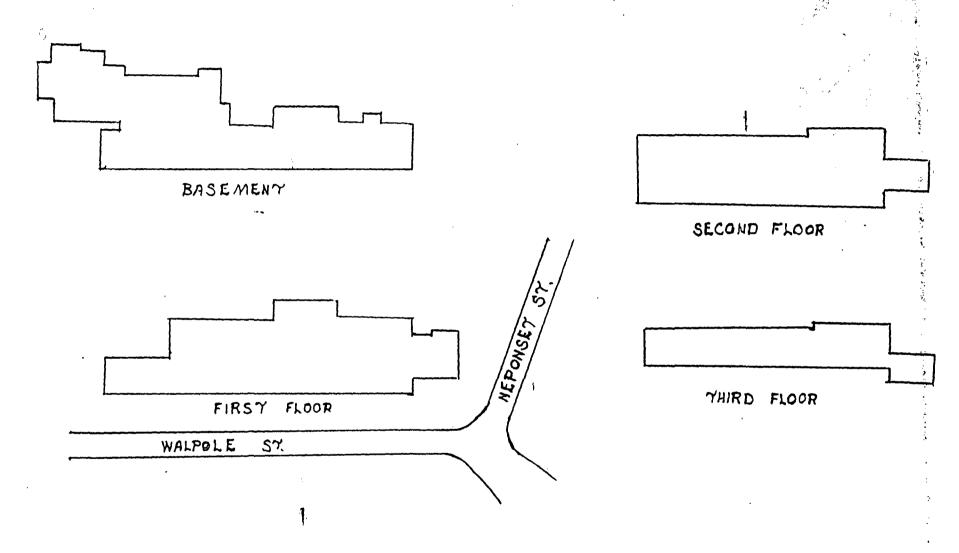
# APPENDIX III - (v)

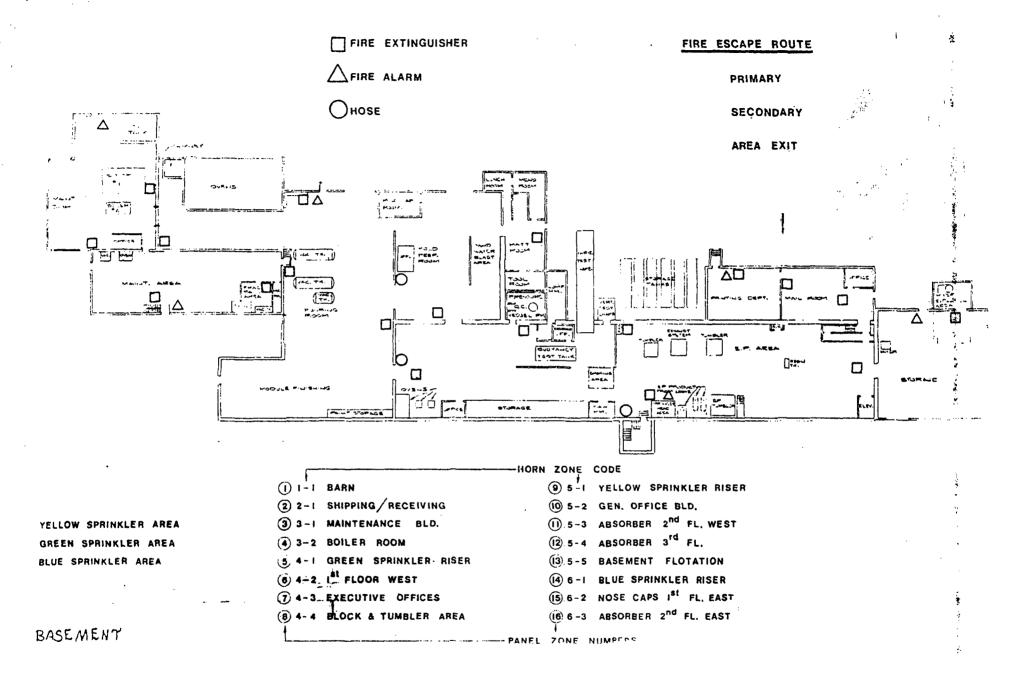
Raw Material-Chemicals Name		Annual Use in 1bs.	COMMENTS		·	
Acrylate Copolymer Latex	••••	80,000		: . Çâ	,	-
Acrylis Latex	••••	100,000		. <i>R</i>		
Butyl Carbitol		7,000		 		
Butyl Cellusolve		30,000			,	
Castor Oil, USP Grade AA	• • • • •	500		 		-
Cellusolve Acetate	• • • • •	500				_ 1
Cobalt Naphthanate in Mineral Spirits		100		,		
DiAcetyl Alcohol		5,000			•	-
DiButyl Phalate		3,000				_
Dodecylsuccinieanhydride	• • • • •	400,000		 		-
Epoxy curing agent (Amine)	••••	30,000				-
Epoxy curing agent (VERSAMID)	••••	10,000			,	_
Epoxy Paint Hardener		2,000		 		_
Epoxy PAINI RESIN		20,000				
Epoxy Resin		5,000				_
Liquid Epoxy Resins		200,000				_
Liquid Expsy Resins		400,000				_
Lubricating Oils		2,000				
MEK Peroxide		200			:	_
Methylene Chloride	• • • • •	30,000			:	
Nadic Methyl Anhydride		1,000		 1	;	

Raw Materials-Chemicals Name	<u> </u>	Annual se in 1bs.	COMMENTS					·	
Napthalatic Defoamer	••••	3,000						<u>.</u>	
Neoprene Latex 400	• • • • •	6,000		ı				····	
Nonionic Surfactant	• • • • •	1,000	····					· 	
Pliobond Adhesive		2,000	······································					Ä.	
Silicone Defoamer	••••	2,000	<del></del>			and the second	·	ęi —————	
Silicone Resins	• • • • •	10,000	<del></del>		<b></b>	· .	:		
Silicone Surfactant	• • • • •	200		·	ł	·			
Sodium Polyacrylate	• • • • •	1,000					<del></del>	· ·	
Styrene Monomer PM	• • • • •	1,000	<del></del>				· · · · · · · · · · · · · · · · · · ·	· · ·	
Tertbutylstyrene	• • • • •	40,000				<u> </u>	·	*	
Tetraethylinepentamine		20,000			·				
Trimethylol Propane Trimethacrylate	• • • •	2,000	·				·		
Toluene		500					· · · · · · · · ·	) 1	
Xylene	• • • • •	5,000						1. \$	

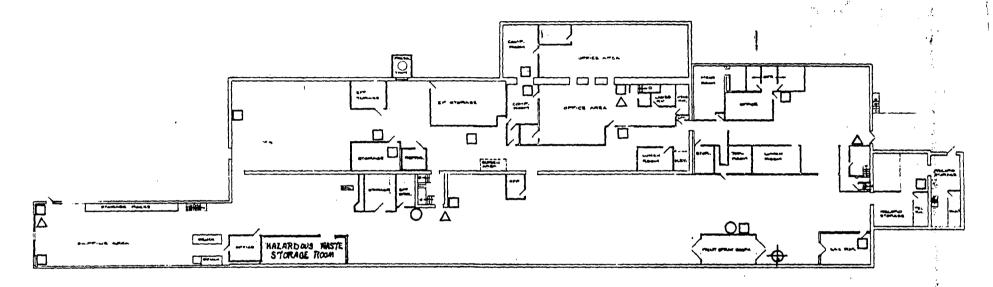
## APPENDIX III -- FACILITY MAP-PLOT PLAN (vi)

# EMERSON & CUMING INC. PLANY #2





- TIRE EXTINGUISHER
- A FIRE ALARM
- O HOSE
- + FIRE HYDRAHY

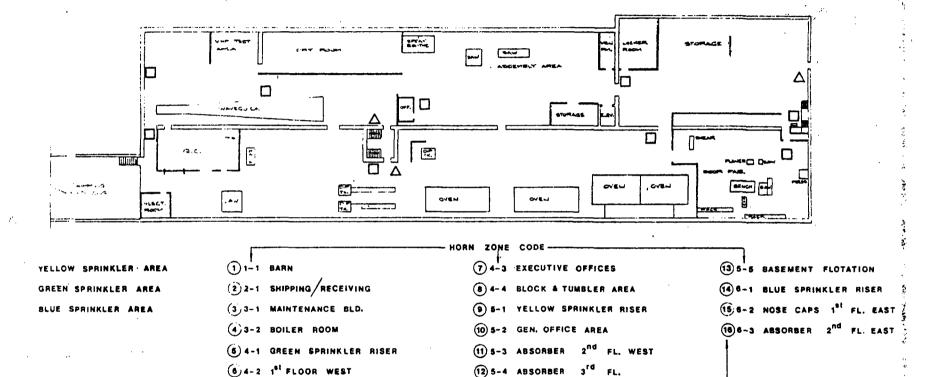


FIRST FLOOR

FIRE ALARM

PRIMARY

SECONDARY



SECOND FLOOR

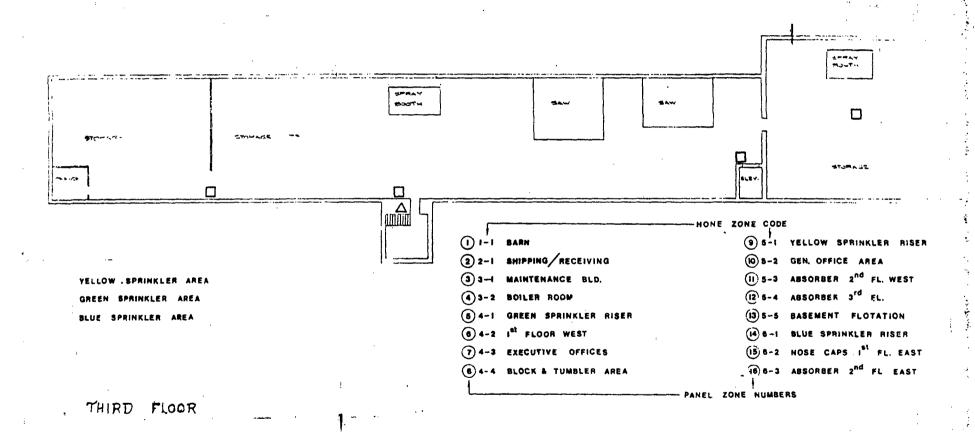
A FIRE ALARM

FIRE EXTINGUISHER

#### FIRE ESCAPE ROUTE

PRIMARY

SECONDARY





W.R. Grace & Co.

Canton, Massachusetts 02021 Telephone (617) 828-3300

November 20, 1984

Mr. Michael A. Walsh Sanitary Engineering Section Sewerage Division Metropolitan District Commission 20 Somerset Street Boston, Mass. 02108

Dear Mr. Walsh:

Please find attached the permit application for 1985, per our meeting October 15, 1984. I enjoyed meeting with you for your audit on that day ans was pleased that you found everything acceptable and in order.

Sincerely,

Randolph M. Olson

alph M als

Plant Manager

!/IP-2103

UN 13 1984

ndolph M. Olson, Plant Manager erson & Cuming Walpole Street nton, MA 0202L

: NPDES Application No.

ar Mr. Olson:

ar application for a National Pollutant Discharge Elimination stem (NPDES) permit has been reviewed and appears to be complete. I may be contacted for additional information as the permit is reloped, should it be necessary to clarify, modify or supplement, previously submitted information. By copy of this letter, your the Water Pollution Control Agency is being furnished a copy of ir complete application for certification pursuant to Section (a)(1) of the Clean Water Act, as amended, 33 U.S.C §1341(a)(1).

raft permit and statement of basis or fact sheet will be prepared this office and forwarded to you for comment prior to the opening the public comment period. The draft permit will then be publicl iced and forwarded for state certification if certification has previously been received on the application. If it is deemed essary, a public hearing will be held, in which case, the comment iod will be extended until the close of the hearing. After the se of the public comment period, your final permit will be issued viding no new substantial questions are raised. If new questions elop during the comment period, it may be necessary to draft a permit, revise the statement of basis or fact sheet and/or reoper public comment period.

waiver of testing requirements requested in your letter of 8, 1984 for Outfall 001 has been granted for the following meters: BOD, COD, TOC, TSS and Ammonia.

Ild you have any questions concerning the permit issuance process, t hesitate to contact Nanci Siciliano, of my staff. She may be hed at 617/223-3940.



### Emerson & Cuming

Dewey and Almy Chemical Division W. R. Grace & Co. Canton, Mass. 07021

(617) 828-3300

May 8, 1984

Ms. Nanci Siciliano
U. S. Environmental Protection Agency
Region 1
Water Quality Branch
J. F. Kennedy Federal Building
Boston, Mass. 02203

### Dear Nanci:

Enclosed is our application for an N.P.D.E.S. Permit. We would like to request a waiver on the testing requirements for Section V, Part A. We have no reason to believe that our discharge water could be contaminated. One water sample taken on 5/8/84 was 13°C with a pH of 6.92. Thus, we have estimated termperature and pH ranges as well as estimating a maximum flow based on estimated 2 inches of rainfall in one day (maximum).

Please contact myself or Jay McNeff for any additional information which may be needed. We look forward to having our permit application approved in the near future. Thank-you for your assistance in this matter.

Sincerely,
Emerson & Cuming
59 Walpole Street
Canton, Mass. 02021

Randolph M. Olson Plant Manager

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used for enhanced recovery of sject fluids for storage of liquid		]	tion of fossil fuel, or rec	of minerals, in situ combus- covery of geothermal energy?			
4) sed stationary source which is	34 36	34	(FORM 4)	ed stationary source which is	37	20	36
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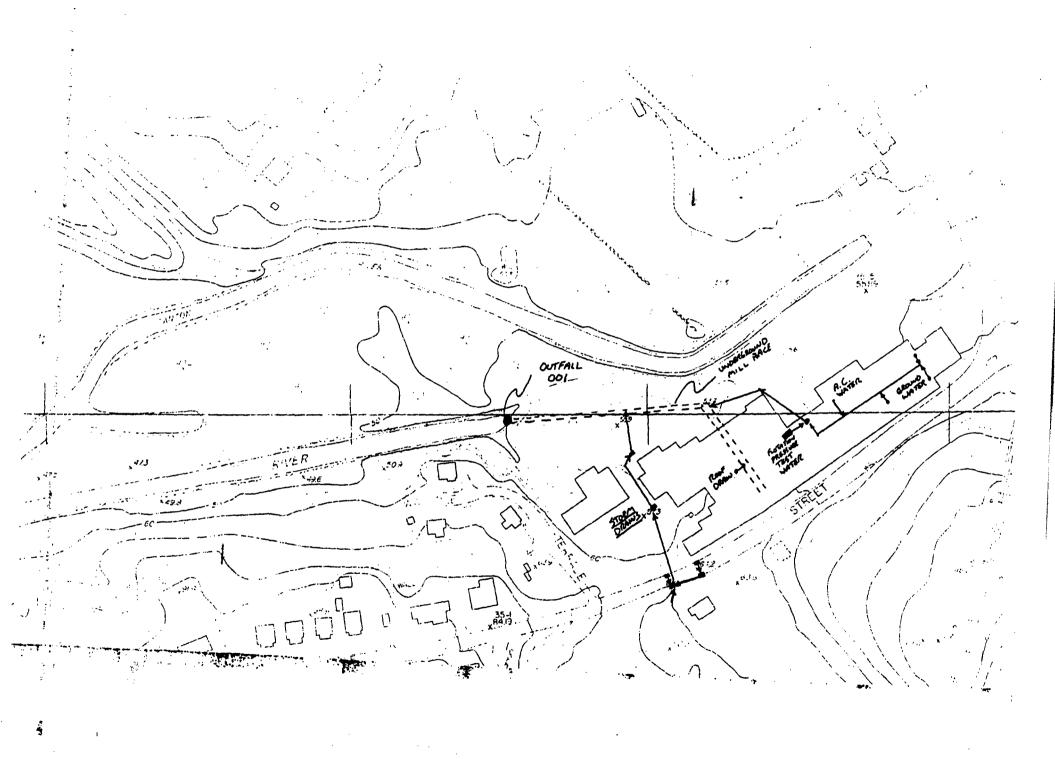
ion a topographic map of the area extending to at least one mile beyond property bounderies. The map must show lity, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface p area. See instructions for precise requirements.

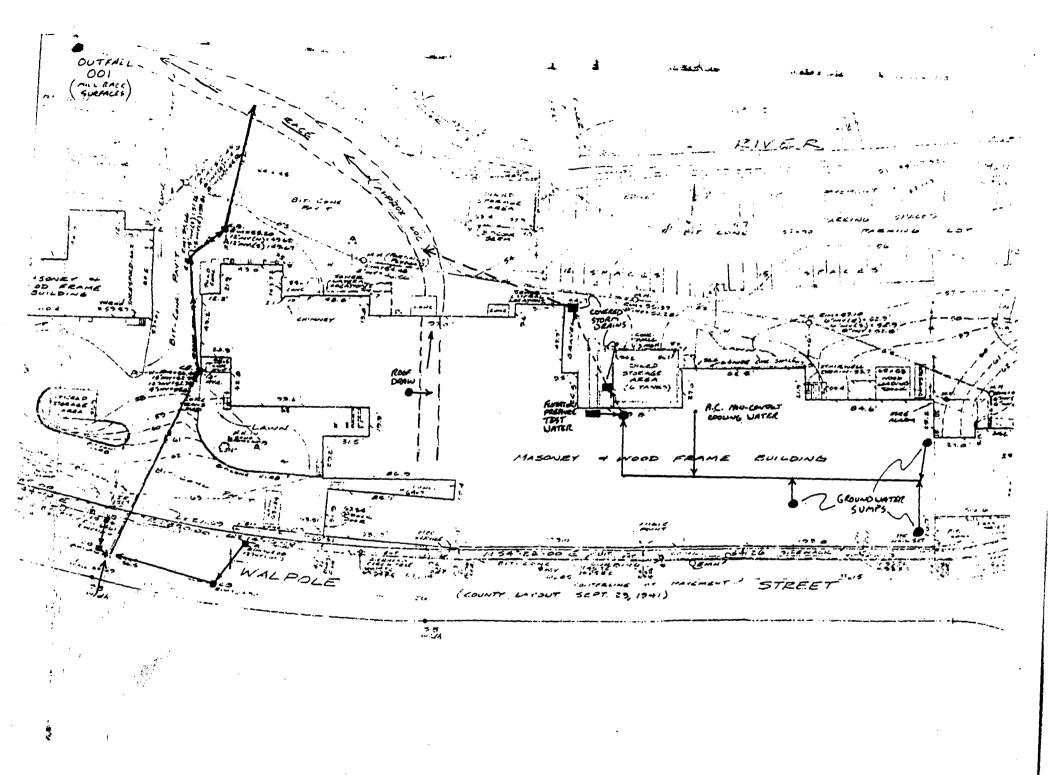
### \$\$ (provide a brief description)

YNTACTIC FOAM FLOTATION PRODUCTS FROM EPOXY RESIN AND GLASS FILLER SYSTEMS. URE MICROWAVE ABSORBER (CARBON IMPREGNATED FOAM) PRODUCTS.

Instructions!

of law that I have personally examined and am familiar with the information submitted in this application and all based on my inquiry of those persons immediately responsible for obtaining the information contained in the hat the information is true, accurate and complete. I am aware that there are significant penalties for submitting





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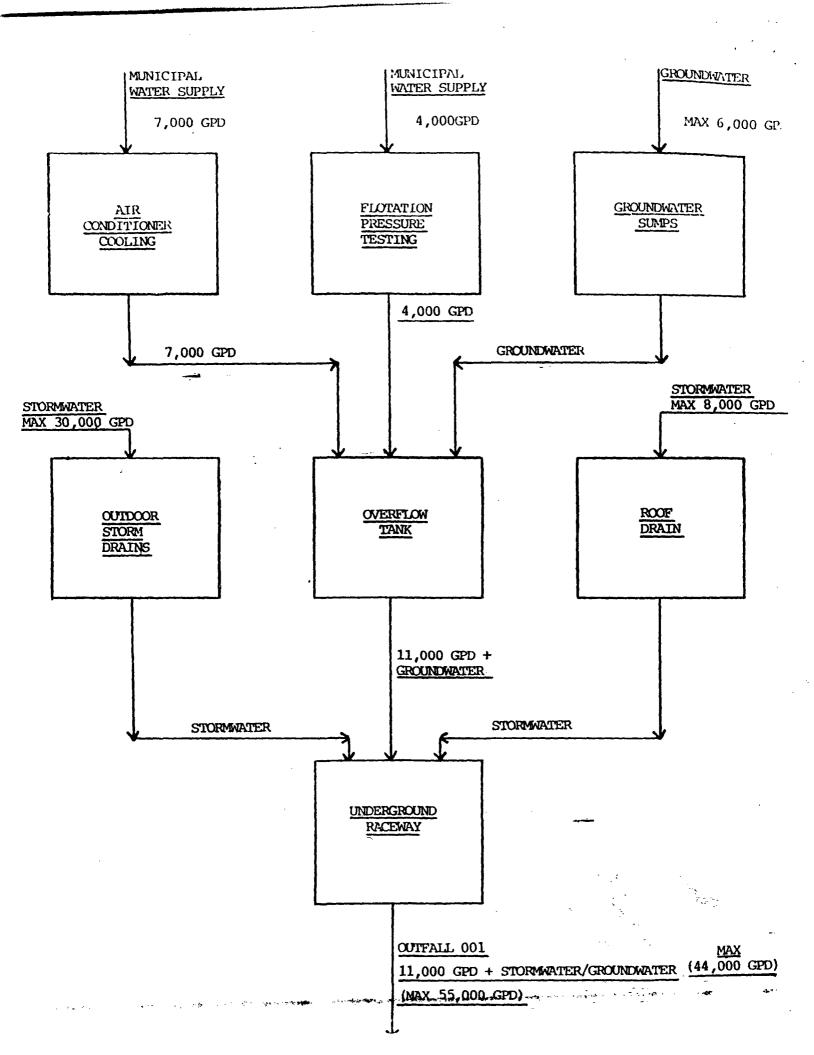
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## II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNULOGIES

- A. Attach a line drawing showing the water flow through the however indicates of make water, operations contributing wastewater to the ellipside and treatment units labeled to correspond to the move detailed descriptions in them. B. C. instruct a water balance on the line drawing by showing average flows between inclakes, invertations, treatment units, and obtained and any collection or treatment measures.
- B. For each outfol, provide a describing of: (1) All operations contributed by each operation, and (3) The treatment received by the wastrouter. Contributed by each operation, and (3) The treatment received by the wastrouter. Contributed by each operation, and (3) The treatment received by the wastrouter. Contributed by each operation, and (3) The treatment received by the wastrouter.

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	SUMP PUMPED GROUND WATER	MAX	6,000	GPD	DISCHARGE TO SURFACE WATER	4-A	
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Were any of the analyses reported in Item V perform  YES (list the name, addressed by, each such analyzed by, each such analyzed by, each such according to the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of	med by a contract laboratory or consults, and telephone number of, and polluch laboratory or firm below)  8. ADDRESS  resonally examined and am familia f those individuals immediately re	ar with the infoncesponsible for obj	X) NO (so to Sec	ted in this a
Were any of the analyses reported in Item V perform  YES (list the name, addressed by, each such analyzed by, each such analyzed by, each such acceptance of the second complete of the second complete. It is true, accurate and complete. It	med by a contract laboratory or consults, and telephone number of, and polluch laboratory or firm below)  8. ADDRESS  resonally examined and am familia f those individuals immediately re	ar with the infoncesponsible for obj	X) NO (so to Sec	ted in this a
Were any of the analyses reported in Item V perform PYES (list the name, addressed by, each such analysed by, each such analysed by, each such as the control of law that I have performation is true, accurate and complete. I consibility of fine and imprisonment.	med by a contract laboratory or consults, and telephone number of, and polluch laboratory or firm below)  8. ADDRESS  resonally examined and am familia f those individuals immediately re	ar with the infoncesponsible for obj	X)NO (so to Sec ELEPHONE a code & no.)	ted in this a
Were any of the analyses reported in Item V perform PYES (list the name, addressed by, each such analyzed by, each such analyzed by, each such analyzed by, each such according to the control of the control of the complete. It is consibility of fine and imprisonment.  A NAME & OFFICIAL TITLE (type or print)	responsibly examined and am familia f those individuals immediately ream aware that there are signification aware that there are significations.	ar with the infoncesponsible for obj	mation submit taining the info submitting fal	ted in this appropriation, I be information.
Were any of the analyses reported in Item V perform PYES (list the name, addressed by, each such analysed by, each such analysed by, each such as the control of law that I have performation is true, accurate and complete. I consibility of fine and imprisonment.	responsibly examined and am familia f those individuals immediately ream aware that there are signification aware that there are significations.	ar with the infoncesponsible for obj	mation submit siming the info	ted in this a

JT	AN	DIS	TRI	CT	NOIZZIMMCD
-	Pari	mit .	100	lica	tion

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WASTEWATER INFORMATION in the table below may be expressed in the following units: check the units you will use and complete the table XIX gallons per day per cent of total daily usage ubic feet per day Discharge Location Storm Drain/ No Dis-Senitary Sewer Surface Other Connection Number * charge Water (Specify) ype Quantity Pretrestment Yes No 3 Other 10,000 XX KI XIX (domestic) Exaporation To Atm. 300 Water/ minated 2,000 To Raceway-To Ri Ø 50 4 粒 C maify): , betch, and intermittent discharges. Check applicable boxes. Cuentity Discharge to Connection Number* Frequency (check one) per Oischerge Pretrestment Yes No Other Weekly Monthly Yearly (include units) XX 50 GPD XX VICEM - 🗖 mical 

Industry Name:

Emerson & Cuming



# Amold Greene Testing Laboratories Incorporated==

East Natick Industrial Park 6 Huron Drive • Natick, MA 01760 (617) 235-7330, 653-5950 Telex 948459 GREENELAB NTIK isonalestra, tree * Chernica * r coution * is etailone, a. Inspection * Evaluation * Analysis Rosearch * Development

#### DIVISION OF CONAM INSPECTION

Branch Laboratories: Springfield, Mass. 01104 (413) 734-6548

Auburn, Mass. 01501 (617) 832-5500

To: Emerson & Cuming, Inc.

Date: 6/06/84

Material: Water sa

59 Walpole Street

Job No. 49637-2

Heat No. None

Canton, MA 02021

Lab No. 1143

Specifications: No

Attn:

Order No. 2-51579

Purpose: To analyze two water samples for DiOctylphthalate.

Method: The samples were liquid/liquid extracted in accordance with the EPA's Analytical procedure for Base/Neutral Extractable compounds and Acid Extractable compounds. The extracts were then analyzed by Gas Chromatographic/Mass Spectrometric technique. (EPA Method 625)

Results: Sample #1

<50 ug/l

Sample #2

<50 ug/l

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND THIS 6th DAY OF JUNE 1984

ARNOLD GREENE TESTING LABORATORIES

PIVISION OF CONAM PASPECTION

James J. Haril, Manager

EPA I.D. NUMBER (copy from Item 1 of Form 1)

MAD 000 361 709 Form Approved
ONIB No. 2000-0059
Approval expires 3-31-64

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets *(use the same format)* instead of completing these pages. SEE INSTRUCTIONS.

V. INTAKE AND EFFLUENT CHARACTERISTICS (continued from page 3 of Form 2-C)

001

				. EFFLUENT				3, UN		4 114	TAKE per ton	١١.
. POLLUTANT	a. MAXIMUM	DAILY VALUE	b. MAXIMUM	DAY VALUE	C.LONG TERM	WAG VALUE	d, NO. OF	(specify t)	hlank)	AVELAGE VALUE		111 71
*	(I)	(2) MASS	CONCENTRATION	falmen	(i)	(2) MASS	ANALYSES	A. CONCEN- TRATION	b, MASS	CONC. NO. COM	fri mar is	TAMEL
a. Blochemical Oxygen Demand (BOD)	TAW	ER REQUE						:				1
b, Chemical Oxygen Demand (COD)	WAI	ER REQUE	STED									
e. Total Organic Carbon (TOC)	WAI	VER REQUE	STED									:
d. Total Suspended Solids (TSS)	WAI	VER REQUE	STED									
• Ammonia (as N)	WAI	VER REQUE	STED									
. Flow	55,000	GPD	VALUE	<del></del>	VALUE					VALUE	<del></del>	
g. Temperature (scinter)	VALUE 5°C		VALUE		VALUE	<del></del>		°C	·	VALUE		
r. Temperature (r.mmer)	VALUE 20°C		VALUE		VALUE	·		'n	<del></del>	VALUE	ang pada di darangan kada darih m	1-
рН .	6.8	7.1	MUMINIMUM	MAXIMUM				STANUAR	DUNITS			

PART B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you must provide the results of at least one analysis for that pollutant. Complete one table for each outfall. See the instructions the meledetails and requirements.

1. POLLUT-	2 MA	NK X				EFFLUENT				4. U	NITS	T	5 111	TAKI	
ANT AND CAS NO.	3.05	D. a.	a, MAXIMUM	DAILY VALUE	D. MAXIMUM 3	DAY VALUE	CLONG TERM	AVRG. VALUE	LNO. OF	B. CONCER.	ti, MASS		ERA	TEVAL.	
(If evallable)	5 k 4 7	A SI .	CONCENTRATION	(c) MASS	CONCENTRATION	(z) MASK	CONCENTRATION	(2) MASS	YSES	TRATION	0, 010,00	i	A *: 6+*		i .
a. Bromide (24959:67-9)		X										1			
n. Chlorine Total Residual	-	х													
c Color		х													
d, Fecal. Coliform		X	ur.												
6. Fluoride (16984-48-8)		x										i -			1
Nitrate- Nitrite (\$6 N)	,	х				·	·								

TEM V-B CONTINUED FROM FRONT 5. INTAKE / orthord i. ROLLUT-ANT AND CAS NO. (if svallable) 2. MARK 'X' 3. EFFLUENT 2.0 4. UNITS S. SC. D. DE. S. MAXIMUM DAILY VALUE b. MAXIMUM 30 DAY VALUE CLONG TERM AVEC. WALUE d. NO. OF AVERAGE VALL A, CONCEN-TRATION ANAL. YSES CONCENTRATION CONCENTRATION 528. CHIRATION 121 *** . (2) MASS (r) Mass g. Nitrogen, Total Organic X (m N) h. Oil and X dress . Phosphorus (7 /23-14-0) Х j. Andloactivity (1) Alpha, Total X (L: Bota, X "otel: (3) Redium, X Total 4) Radium Х 226, Total i. Bullate (4 504) (14808-79-8) X I, Suffide (a. 8) m, Suffite (at 80g) (14268-45-3) Х n, Surfactants Х o. Aluminum, Total X (7429-90-8) p. Berlum, Tetal X (7440-39-3) q. Soren, Total X (7440-42-8) 7. Cobelt Total (1440-48-4) X 1 (100), Total (7439-89-6) X t. Magnasium, Total X (7439-95-4) a. hielybdenum, χ Total (7439-98-7) v. Manganesa, X ( 439-96-5) w. Tin. Total (7440-33-5) X

x (tenium,

EPA I.D. NUMBER (copy from Item 1 of Form 1) OUTFALL NUMBER

MAD 000 361 709

001

Form Approved OMB No. 2000-0059 Approval expires 3 31-84

"ART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must s for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenois. If you are not required to mail column 2-a (secondary Industries, non-process westsweter outfalls, and non-required GC/MS fractions), mark "X" in column 2-b for each pollutant you know or have the column and the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column as the column are column are column as the column are column as the colum

to believe is present. Mark "X" in column 2-c for each pollutant you believe to be absent. If you mark either columns 2-a or 2-b for any pollutant, you must provide the sults of at least one analysis for that pollutant. Note that there are seven pages to this part; please review each carefully. Complete one table (all seven pages) for each outlet

CONTINUED FROM PAGE 3 OF FORM 2-C

POLLUTANT	2.1	MARK	'X'	•		3, i	EFFLUENT			E.	4 UI	41TS	5. IN	AKE John
AND CAS NUMBER	A 77 97	h er.	C 0 4.	a, MAXIMUM DA	ILY VALUE	D. MAXIMUM 3	DAY VALUE	C.LONG TEPM	AVHG. VALUE	1 NO.01	A. CONCEN	b, MASS	Z.VE PAS	VALJE
(if evailable)	96.	PRET		B. MAXIMUM DA	(2) MASS	CONCENTRATION	(2) MASS	CONCENTRATION	(7) MASS	ANAL-	TRATION	0, M A 3 /	THAT'S	1 10 4 4 5
TALS, CYANID	E, AN	ATOT C	L PHE	NOLS									1	
. Antimony, 121 (7440-36-0)			x											ı
Amenic, Total (40-38-2)			х				•							
t. Beryllium, 24,-2440-41-7)			х											:
f. Cedmium, (440-43-9)			х											
f. Chromium, He! (7440-47-3)			х											
4. Copper, Total 550-50-81			х			·								
1. Lead, Total <'29-97-6)			х											
i. Mercury, Total 639: <b>47</b> -6)			х											
. Mickel, Total 49-02-0)			х											i
Setenium,			х											
or Silver, Total 440-22-4)			х											
71. Thallium, rai (7440-28-0)		ar .	. Х											
M. Zinc. Total 440-66(6)			X											
*A. Cyenide, tral (57-12-5)			Х											
Pr. Phenois, otal		19.7 18.8 5.7	х											
OXIN	·			<del></del>		·	*			<del></del>	·			
3,7,8-Tetra- 'gredibenzo-P- umin (\$764-01-6)	-		х	DESCRIBE KESU	LTS .	<u> </u>	·					· · · · · · · · · · · · · · · · · · ·		

^{5 1} Form 3510-2C (Rev. 12-80)

CNTINUED FROM THE FRONT POLLUTANT 4. IIPHTS 2 MARK X 3. EFFLUENT 5 14 15 + L - 10 IND CAS b. MAXIMUM 30 DAY VALUE CLONG TERM AVRG. VALUE IN NO CI arrithmer Con a. MAXIMUM DAILY VALUE HUMBER & CONCEN ING LIEVESLIEVE ANAL TRATION T. [1] tif evailable! (I) [2] -ALS *(2) MASS VSES (.) MASS IC/MS FRACTION - VOLATILE COMPOUNDS V. Acrolein 107-02-8) X V. Acrylonitr'is 0-13-1) X iv genzene 1.43-2) X Bla (Chlorois fityl) Ether X 542-88-1) Bromotorm 26-21 X V Carbon "mrechloride X 15-23-51 M. Chiorobenzene 106-90-71 : Chlorodinomethene X 174-48-11 ·V: Chloroethane 7 (0-3) X DV. 2-Chlorotrylvinyl Ether Х 17.75-8) 1%. Chloroform 1.06-3) X av. Dichloro. romomethane Х /: 27-41 iv. Dichlorodicoromethane Х 73-71-81 1.1-Dichlorothane (75-34-3) Х fry. 1.2-Dichlorostrane (107-06-2) Х o'. 1,1-Dichloro. 11% lene (75-35-4) TV. 1,2 Dichlorn : pane (78-87 5) Х 1 . 1,3 Diet 10:0 copylene X 542-75 61 3V. Ethylbergene X 100-41 4) ... J. Methyl omide (74-83-9) X 11 V. Metavi 11: orlde 774-87 3)

H. — NON-DISCHARGED WASTE reste liquids or sludges removed from facility at these may best be described and quantified as:  Type  XX Waste Solvent  Waste Product  XX Oil  Grease  Pretrestment Sludge  Inks/Dyes  Thinner  XX Paints  Acids and Alkalies  Plating Wastes	ite? 🗵	Yes	Estimated Gall 2,000	ons/Yeer	
these may best be described and quantified as:  Type  XX Waste Solvent  Waste Product  XX Oil  Grease  Pretrestment Sludge  Inks/Dyes  Thinner  XX Paints /  Acids and Alkalies		Yes	Estimeted Gall	ons/Yeer	,
Type  XX Wasta Solvent  Waste Product  XX Oil  Gresse  Pretrestment Sludge  Inks/Dyes  Thinner  XX Paints /  Acids and Alkalies		-	2,000	ons/Yeer	,
Waste Solvent  Waste Product  KK Oil  Gresse  Pretrestment Sludge  Inks/Dyes  Thinner  KK Paints /  Acids and Alkalies		-	2,000	Ons/Yeer	•
☐ Waste Product  XX Oil ☐ Gresse ☐ Pretrestment Sludge ☐ Inks/Dyes ☐ Thinner  XX Paints / ☐ Acids and Alkalies		-			,
CK Oil Grease Pretrestment Sludge Inks/Dyes Thinner CK Paints / Acids and Alkalies		-	200		,
☐ Grease ☐ Pretrestment Sludge ☐ Inks/Dyes ☐ Thinner  XX Paints / ☐ Acids and Alkalies		-	200		,
Pretrestment Sludge Inks/Dyes Thinner XX Paints / Acids and Alkalies		-			`
☐ Inks/Dyes ☐ Thinner   XX Paints / ☐ Acids and Alkalies		-			
☐ Thinner   Thinner  Acids and Alkalies		-			
Paints /  Acids and Alkalies					
☐ Acids and Alkalies				·	
· ·		-	500		
C Dissing Waster		-			
- riduing treates			· · · · · · · · · · · · · · · · · · ·		
☐ Pesticides				·····	
XX Other (specify):		-	1 000		
Carbon Black Soluti	<u>o</u> n	_	1.000	<del></del>	
Epoxy Resin Waste			500		
r company remove the above wastes from the se the name(s) and address(es) of all waste hau nical Waste Management trathmore Road		0	Yes ÆK No	,	
ick, Mass.					
Zio Code: 01760				Zip Code: _	· .
it Na. (if spalicable) MAD980523203		Permi	t No. (if applicable	. '	±2.4
udges, liquids, sos, placed with treet for dispo	mai?	<b>Q</b> Y	es 🗓 No	,	
					~

ILITAN DISTRICT COMMISSION

LITAN	DISTRICT	COMMISSION
lear Peri	mit Apolica	tion

Industry Name:	Emerson & Cuming
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# I. - CHARACTERISTICS OF DISCHARGES

wastawater analyses have been performed on the wastawater discharges from your facilities attach a copy of the most data to this application. Be sure to include the date of the analysis, name of laboratory performing the analysis and n(s) from which sample(s) were taken (attach sketches, plans, etc. as necessary).

indicate by placing an "X" in the appropriate box by each listed chemical whether it is "Suspected to be Present", sown to be Present" in your manufacturing or service activity or generated as a byproduct. Some compounds are by other names.

	CTED	2 2
CHEMICAL COMPOUND	SUSPECTED PRESENT	KNOWN
ammonia		
argestos (fibrous)		
cyanice (total)		
antimony (total)		
amenic (total)		
beryslium (total)		
cadmium (total)		
aramium (total)		
copper (total)		
lead (total)	İ	
mercury (total)		
nicxel (total)		LX
selemum (total)		
silver (total)		
trallium (total)		
zine (total)		
acenegathene		
aceneohthylene		
scroldiu		
acrylonitrile	<u> </u>	
sidrin	<u> </u>	
arithracane		
peu teue	ļ	
benziaine		
benzo (a) anthracane	1	
cento (s) ovrene	1	
benza (b) fluorantmene	<u> </u>	
oenza (q,n.i) perviene		
benza (k) fluoranthene	J	
a-BHC (arons)		
5-BHC (Sets)		
3-BHC (amtai	1	

<del></del>			
ITEM NO.	CHEMICAL COMPOUND	SUSPECTED	KNOWN Present
38.	bis (2-emvihexvi) Ohthelete		
39.	bramagichlaromethene		
40.	promotorm		
41.	bromomethane		
42.	4-promophenylonenyl ether		
43. 1	prichipeushi outuares		
44.	carbon tetrachloride		
45.	cniordane		
46.	4-cniero-3-methylphenol		
47.	chloropenzene		
48.	chloroethane		
49.	2-coloroethylvinyl ether	i 1	
50,	chiorotorm	1 1	
51.	chloromethana	1	
52.	2-chloroneghthelene	.	
33.	Z-chiordonenol		
54.	4-chlorophenylonenyl ether		
55.	chrysene		
56.	4,4* - 000	1	
57.	4.4' - ODE	T	
58.	4,4' - 007		
59.	dibenzo (4,0) anthracene	Ī	
60.	dibramacnioromethene .	1	
61.	1, 2-dichterogenzene		
62,	1, 3-dichloropenzene	1	
63.	1, 4-dichteropenzane		27
54.	J, 3'-aschioropenziaine	1	1
35.	dictriorodiffuoromethene	l	
ŝ <b>₫.</b>	1, 1-alcheargemene	1	
87.	1, 2-dichterdetnene		
58.	1, 1-dicreoroethere	T	
69.	trene-1, 2-dientoroemene	1	
70.	2, 4-sicttorognenal		
23.	1, 2-dichtorograpene	ī	

***

MAD 000 361 709 001 Form Approved OMB No. 2000 0059 Approval exulting 3-31,84 **CONTINUED FROM PAGE V-4** I. POLLUTANT 2. MARK 'X' 1 J. EFFLUENT 4. UNITS AND CAS D. MAXIMUM TO DAY VALUE CLONG TERM AVEG. VALUE A NO. OF ATTST D. BE- C. BE-ING LIEVELLIEVEL RE- PRE- AB-QUIR- SERT SENT & MAXIMUM DAILY VALUE a. CONCEN ANAL TRATION (If evailable) CONCENTRATION (I) (2) MASS--(1) MASS GCAMS FRACTION - VOLATILE COMPOUNDS (continued) 22V, Methylene Chioride (75-09-2) 23V. 1,1,2,2-Tetra chloroethane X

zihylene (127-18-4) 25V. Toluene :108-88-3) X 25V. 1,2-Trans-Dichloroethylene X 156-60-51 27V. 1,1,1-Tri-X 71-55-6} 28V. 1,1,2-Tri-X 79-00-6) 19V. Trichloro-X thylene (79-01-6)

5. IN PARE option h

A LONG TEND

TRATE A (1) WASS

11 V. Vinvi X Thioride (75-01-4) C/MS FRACTION - ACID COMPOUNDS 14. 2-Chlorophenni X 95-57-8) A. 2,4-Dichloro

A. 2,4-Dimethyl-X heno! (105-67-9) A. 4,6-Dinitro-O-X resol (\$34-52-1) A. 2,4-Dinitro-

X 110001 (51-28-5) A. 2-Nitrophenol X 38.75.51 A 4-Nitrophenol X 100-02-7)

A. P-Chloro-M-X resol (59-50-7) A. Pentachloro-hanol (\$7-86-5) X

IOA. Phenol

79-34-6) 24V. Tetrachioro-

10V. Trichloro. upromethene

monol (120-83-2)

75-69-41

X

Х

X

ONTINUED FROM THE FRONT

PALUTANT	2.2	ANK	×		<b>****</b>		TAIL LUBY	<b>建设工程</b>	***	. 1	4. Ut	NITS		AKE fopti	nna
AND CAS SOMBER Problem	775	200	0. 00v	A. MAXIMUM'E	VILA AVER	P. NY BANK	Ant Luci		AVES. VALUE	d NO.OF	s. CONCEN- TRATION	b, MASS	AYERAG		1
	evin-	****	45.00	CONCENTRATION	(2) MAPO (7)	des alle King	The Control of	A THE TIME	/ (z) m440	YSES			(1) CONCENT	(1)	+
FRACTION	- BAB	EVMEN	TRAL	COMPOUNDS									ļ		+
			x												].
Sep St			x							i			}		}
97.			х												†
\$ 7-61			х												
Cone ()			х												1
l. turies (e) reje (50-32-8)			х				•								
3.4-Bonzo- 36-36-00-00 08-00-2)			х	·											
t Sureo (sht)			х										!		
Corentrale			х									· · · · ·			1
b Ste (3-Chloro- 15-91-1)			х											·	1
Bi Bis (2-Chloro- gl) Extrer 1-44-4)		_	x												1
B. Bis (3-Chiloro- propyr) Ether (8:38-82-9)			x			<u> </u>									1
E. Sin (2-Sthyl- cyl): Firthelata (7-92-5)			х												1
4.4-Brome- myl Phanyl fur (101-58-3)			х												1
Sury Serzyi			х												1
T-00-77	1		х												
100 726)			х												
S. Chrybens 12019)	6	9.1 ^{2.1}	х												
& Deans (ah)			х	·											
75. 1,2-Dichidro- rozone (96-60-1)			х												
g. 1,3-Dichloro- meone (641-73-1)			Х									<b> </b>			-

The second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second secon

EPA I.D. NUMBER (copy from Item I of Form 1) OUTFALL NUMBER MAD 000 361 709 001

Porm Approximations of Guild Approximations of Section 3:31-24

ONTINUED FRO					1.23	D 000 361			01	٠			at 00009 atts 3-31-24	
POLLUTANT		MARK					EFFLUENT	·	- 		4. UN	1115	5 INT	
NUMBER	4 74 97	b.er.	C ee.	. MAXIMUM DAIL	VALUE	b. MAXIMUM 3	HOLL VALUE	CLONG TERM	ROSE VALUE	d, NO. 01	4 CONCEN	ti MAS"	ALONG	i tta sa Li Vija sa sili
(if evailable)	auja.	SEAT		S. MAXIMUM DAILS	1 4429	CONCENTHATION	(1) MASS	CUNCENTRATION	(1) MASS	YSES	TRATION	11 m A 3 ·	In the same of the	1.1.4.4.4
C/MS FRACTION	- BA	SE/NE	UTRAI	COMPOUNDS (conti	nued'			CONCENTRATION		<del> </del>			1	•
28. 1,4-Dichloro- enzene (106-46-7)			х							1				•
38. 3,3°-Dichloro- enzidine 91-94-1)			х											
48. Diethyl hthalate 54-56-2)			х											
58. Dimethyl hthelete 131-11-3)			×											
68. DI-N-Butyl hthelete 84-74-2)			х						//					
78, 2,4-Dinitro- pluene (121-14-2)			x											
88. 2,6-Dinitro- aluena (606-20-2)			х										; ;	
98. DI-N-Octyl hthelete 17-84-0)			х											
8. 1,2-Diphenyl- drzzine (as Azo- nsene) (122-86-7)			x									 L <u>.</u>		
18. Fluoranthene 198-44-0)			х						·					•
28. Fluorene 36-73-7)			х											
33. Hexa- Horobenzene 118-71-1)			х										· · · · · · · · · · · · · · · · · · ·	
48. Hexa- niorobutadiene 17-68-3)			х											· ·
58. Hexachloro- /clopentadiene  7-47-4			Х											, 
8. Hexachloro- hane (67-72-1)	:		х											  -   • •
78. Indeno (2,3-cd) Pyrene (93-39-5)			Х									• •• · ·		
8. (sophorone 8-59-1)			х											
98. Nephthalenc 91-20-3)			х						.•			<b></b>		
08. Nitrobenzene v8-95-3)	1		х	19	-								!	

CONTINUED FROM THE FRONT 1. POLLUTANT 2. MARK 'X' 3. EFFLUENT 4. UNITS 5. INTAKE Continuals AND CAS A LONG TEHM b. MAXIMUM 30 DAY VALUE CLONG TERM AVRG. VALUE d NO OF 1. ... ATEST DOG COC. a. MAXIMUM DAILY VALUE NUMBER a. CONCEN-U. MASS HE TIEVERLIEVED ANAL. A ** TRATION IL CONT ! N [1] CONCENTRATION (1) SONCERTRATION III MAGG · v · (if eveilable) (s) MASS (1) MASS GCMS FRACTION - BASE/NEUTRAL COMPOUNDS (continued) 438. N-NITOsodiphenylemine (86-30-6) X 448; Phonenthrene (85-91-8) X 458/Pyrene (129-00-0) X 468, 1,2,4 - Tri-chlorobenzene (120-82-1) X GC/MS FRACTION - PESTICIDES 1P. Aldrin X (309-00-2) 2P. Q-8HC X (319-84-6) 3P. B. BHC Х (319-85-7) 4P. 7-BHC (58-89-9) X 5P. 6-#HC X (319-86-8) 6P. Chlordane X (57-74-8) 7P. 4.4'-DDT Х 0-29-31 9P. 4,450DE X 72-55-91 3P. 4,41000 X 72 54-8) 10P, Dieldrin X 60-57-11 11P. C.Endosulfan-Х (115-29-7) 12P. B.Endosulfen Х 115-29-71 13P. Endosulfan iulfate X 1031-07-81 4P. Endrin X 72-20-81 5P. Endrin Videhyde X 7/121-93-41 16P, Heptachlor 76-44-81 Х

1. 6. 5. - 1.7

EPA I.D. NUMBER (copy from Item I of Form I) OUTFALL NUMBER 001

MAD 000 361 709

Form Approved
OMB No. 2000-0059

 $\underline{\mathbf{A}}(\mathbf{t}) \cdot \mathbf{S}_{t} \in \mathbb{R}^{n \times n}$  , where  $\mathbf{A} \in \mathrm{PKD}(\mathbf{t}, t)$  , which is the second

ONTINUED FROM	A PAG	E V-8			. M2A	D 000	361	709		001	<u> </u>		OMB No Approva	. 2000-0059 Lexpires 3-31	-84	
1. POLLUTANT					. # . W	ALVE EFFLUENCES						4. UNITS S, INTAKE for			TAKE JOPIN	nnat
AND CAS NUMBER	0.TE 07	b.ee.	G et:	& MAXIMUM D	AILY VALUE	B. MAXIMUM S		38.86 Y X 3415	LLONG TERM	ONG TERM AVEC. VALUE		a. CONCEN-	b, MASS		S TERM E YALUE	D NO
					(1) MASS	FONCER	-	THE PERSON NAMED IN	CONTRATION	(2) MASS	ANAL.	TRATION	U. M	(I) CONF PM	121	A 2/4
3C/MS FRACTION	- PE	ITICID	E <b>3</b> (co	ntinued)					1 de 1							
17f. Heptechlor Spo <b>xide</b> (102 <b>4-67-3)</b>			x													<u> </u>
18 <b>F. PCB-1242</b> 53 <b>489-21-9</b> )			x								-1				! !	
19 <b>P. PCB-1254</b> (110 <b>67-48-1)</b>			x	·												
20P. PCB-1221 (11104-28-2)			х													
31 <b>P. PCB-1232</b> (111 <b>41-16-6)</b>			х													ļ 
22P. PCB-1248 (12672-29-6)			X	·												
23P. PCB-1260 11006-82-5)			Х	·												
(4P. PCS-1016 12674-11-2)			х													
15 <b>F. Texaphene</b> 800 <b>1-36-2</b> )			х				• • • • •									

PA Form 3510-2C (Rev. 12-80)

PAGE V-9

' METROPOLITAN DISTRICT COMMISSION 20 Somerset Street Boston, Mass. 02108

# INDUSTRIAL USER PERMIT APPLICATION

FOR MDC US	E ONLY					
Category 4	Other 🗍					
Industry Number						
Reviewer's Initials	Date					

1.	CTION A — GENERAL  Business Name of Applicant:  Mailing Address:	Emerson & Cumi Dewey and Almy	ing  Chemical Division,  Street	•					
		Canton, MA	· · · · · · · · · · · · · · · · · · ·	Zip Code:02021					
3.	Facility Address (if different	than mailing address):	Emerson & Cuming 59 Walpole Street						
			Canton, MA	Zip Code: 02021					
4.				Title:Environ.Officer					
5.				irestone					
	Title: Environ. Off	icer	Telephone No.: ( 617 )	828-3300					
SE	information, including the positive Date  CTION B. — PRODUCT	82	Signature of Official	(Seal if applicable)					
1.	Indicate principal products ma	nufactured and/or service	es rendered:						
			syntactic foams con	sisting of resin					
			absorbers are impr						
2.	in various sol Indicate applicable Standard I	utions. ndustrial Classification (SI	C) Code(s) for all processes (if known	own):					

# METROPOLITAN DISTRICT COMMISSION Industrial User Permit Application

Industry Name:	Emerson	&	Cuming
moustry wante.			

Section B - Product/Service Information (Cont'd)

Epoxy Resin Curing Agents	310,400					
Curing Agents		lbs.	<del></del>			
carring rigeries	72,000	lbs.				
Solvents	2,300	lbs.			_	
TION C. — PLA	(a) number of shifts p	per work day:	TERISTIC	2 🗆	3 🗆	-
c) average number of en						3rd
d) shift start times:		1st 7:00	A.M.	2nd		3rd
		•		□ yes	ĽK no	
Are major processes:  a) Average number of b					:	
s a Spill Prevention Cont	rol and Countermeasure	Plan prepared	I for the fac	:ility? 🛭	yes 🗆	no
TION D WA	TER CONSUMPTIC	)N				
	hift information:  c) average number of end d) shift start times: coperation subject to sec e) If yes, indicate mont does operation shut down e) If yes, indicate period re major processes: e) Average number of b is a Spill Prevention Cont	(a) number of shifts p  (b) work days per we  (c) average number of employees per shift: (d) shift start times: (e) operation subject to seasonal variation: (a) If yes, indicate months of peak operation: (b) oes operation shut down for vacation, maintenants) (a) If yes, indicate period when shutdown occurs (c) oes operation shut down for vacation, maintenants (a) If yes, indicate period when shutdown occurs (c) oes operation shut down for vacation maintenants (a) Average number of batches per work day: (a) a Spill Prevention Control and Countermeasure	(a) number of shifts per work day:  (b) work days per week: 4   c) average number of employees per shift:  1st 61  d) shift start times:  1st 7:00  soperation subject to seasonal variation:  poes operation shut down for vacation, maintenance, or other  so operation shut down for vacation, maintenance, or other  so If yes, indicate period when shutdown occurs:  re major processes:  batch  Average number of batches per work day:  N/A  a Spill Prevention Control and Countermeasure Plan prepared	hift information:  (a) number of shifts per work day:  (b) work days per week: 4	hift information:  (a) number of shifts per work day:  (b) work days per week: 4	(a) number of shifts per work day: 1

METROPOLITAN	DISTRICT	COMMISSION
Industrial User Peri	mit Applica	tion

Industry Name:	Emerson	&	Cuming	

Section D - Water Consumption (Cont'd)

	01	1 727 027	
(a) 1st 6 month	period, 19 <u>81</u> :	1,737,827	•
(b) 2nd 6 mont	h period, 19 <u>81</u> :	1,737,827	
Units ar	rein: KK gpd	☐ 100 cf ☐ cf ☐ other (specify):	
(c) Volume from	n other sources:	gallons per day.	
CTION E	- SANITARY SE	WER AND COMBINED SEWER CONNECTION INF	ORMATIO
		a sequential connection number to each sewer connection star ion information on another sheet of 8½x11 paper):	ting with No
Connection Number	Sewer Size	Descriptive Location of Sewer Connection or Discharge Point	Average Flow
	(inches)		(gpd)
1	(inches)	Front of building facing	(gpd) _500
1	(,	Front of building facing Neponset Street	
	(,		
	4"	Neponset Street	_ 500
	4"	Neponset Street  Middle of building opposite	_ 500

2. Attach a scaled drawing of the industrial complex, if available, showing location of sewers referenced in E-1. Show location of possible sampling points for sewers and SIC process effluents. For reference and field orientation, buildings, streets, alleys, and other pertinent physical structures should be included.

Page 3 of 8

METROPOLITAN DISTRICT COMMISSION Industrial User Permit Application

•	Quantities in the	e tabl	e below may	be expr	essed in	the f	ollov	ving u	nits: check	the	units you wi	il use and	d comp	lete the ta
					cubic feet per day			Discharge Location  Storm Drain/ No				e		
												1		
	Usage Type		Quantity	Pretreat	ment				r Sewer		storm Drain/ Surface Water	Dis- charge		Other (Specify)
					No	1	2	3_	Other					<u> </u>
	Sanitary (dome	stic)	1000	_ 🗅	Ø	X	23	<b>D</b> .						<del>-</del>
	Process			_ 🗆				<b>-</b>	·					
	Cooling Water/ Uncontaminate													
	Water	_		_ 🗆				<b>-</b>						<del></del>
	Boiler		400	_ 🗆	<b>K</b> J			<b>X</b> .						
	In Product			_ 🗅										
	Other (specify)	:												
								Π.						<del></del>
	Seasonal, batch	, and is	ntermittent (	discharges	. Check	appli	cable	boxes	i <b>.</b>					
		_					Juan.		_					
	Туре		equency (che Weekly Me		early	per	Disc	harge	Pretreat Yes					ion Numb
		Fre Daily	Weekly Mo		early	per	Disc		Pretreat Yes	ment No		rge to Co	3	on Numb
	Type Boiler Blowdown				early	per	Disc	harge						
	Boiler	Daily [3]	Weekly Mo	onthly Y	<del></del>	per	Disc	tharge units)	Yes	No	1	2	3	
	Boiler Blowdown Cooling System	Daily	Weekly Mo	onthly Y		per	Disc	tharge units)	Yes	No		2	<u>3</u>	
	Boiler Blowdown Cooling System Blowdown Plant	Daily Q	Weekly Mo	onthly Y		per	Disc	tharge units)	Yes	No		<u>2</u>	<u>3</u>	
	Boiler Blowdown Cooling System Blowdown Plant Washdown Equipment	Cally Call	Weekly Mo	onthly Y		per	Disc	tharge units)	Yes	No	<u>1</u>	<u>2</u>	3 93 0	
	Boiler Blowdown Cooling System Blowdown Plant Washdown Equipment Washdown Spent Chemical	Cally Call	Weekly Mo	onthly Y		per	Disc	tharge units)	Yes	No C		<u>2</u>	3 93 0	
	Boiler Blowdown Cooling System Blowdown Plant Washdown Equipment Washdown Spent Chemical Solutions	Cally Call Call Call Call Call Call Call	Weekly Mo	onthly Y		per	Disc	tharge units)	Yes	No		<u>2</u>	3 93 0	

	TROPOLITAI ustrial User Pe		STRICT COMMISSION Application	Industry Nar	me: Emerson & Cuming	
SE	CTION G.	_	PRETREATMENT			
1.	Is any form o	of pro	etreatment (see list below) practiced at t	his facility?	☐ Yes 🖔 No	
	For all waste facility:	stre	ams which are treated before discharge	, check the a	nt used at this	
			Oil Separation		Biological	
			Grease Trap		Equalization	
			Sedimentation		Silver Recovery	<b>*</b> :
			Filtration		Gasoline Trap	
			Chemical Addition		Other (specify):	·
			Neutralization/pH adjustment			
	- Trovide any a					
				<del></del>	<del></del>	<del></del>
	<del></del>	- <u></u>				

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METROPOLITAN DISTRICT COMMISSION Industrial User Permit Application Industry Name: Emerson & Cuming SECTION H. NON-DISCHARGED WASTES 1. Are any waste liquids or sludges removed from facility site?  $\nabla$ Yes □ No If "yes", these may best be described and quantified as: Estimated Gallons/Year Type 500____ **☑** Waste Solvent Waste Product 1000 [] Oil ☐ Grease ☐ Pretreatment Sludge ☐ Inks/Dyes ☐ Thinner ☐ Paints 600 Acids and Alkalies ☐ Plating Wastes ☐ Pesticides ☑ Other (specify): 2000 Carbon Black Solution 2. Does your company remove the above wastes from the facility? ☐ Yes 120 No If no, state the name(s) and address(es) of all waste haulers. a. Chemical Waste Management 5 Strathmore Rd Natick ____Zip Code: __01760_ _____ Zip Code: _____ Mass Permit No. (if applicable) Permit No. (if applicable) 3. Are any sludges, liquids, etc. placed with trash for disposal? ☐ Yes ☑ No Describe:

Page 6 of 8 Charles to the American

Industry Name:	-Emerson	&_Cuming	<del>}</del>
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#### SECTION I. - CHARACTERISTICS OF DISCHARGES

- 1. If any wastewater analyses have been performed on the wastewater discharges from your facilities attach a copy of the most recent data to this application. Be sure to include the date of the analysis, name of laboratory performing the analysis and location(s) from which sample(s) were taken (attach sketches, plans, etc. as necessary).
- 2. Please indicate by placing an "X" in the appropriate box by each listed chemical whether it is "Suspected to be Present", or "Known to be Present" in your manufacturing or service activity or generated as a byproduct. Some compounds are known by other names.

ITEM NO.	CHEMICAL COMPOUND	SUSPECTED	KNOWN
1.	ammonia -		
2.	asbestos (fibrous)		
3.	cyanide (total)		
4.	antimony (total)		
5.	arsenic (total)		
6.	beryllium (total)		
7.	cadmium (total)		
8.	chromium (total)		
9.	copper (total)		
10.	lead (total)		
11.	mercury (total)		<u> </u>
12.	nickel (total)		
13.	selenium (total)		
14.	silver (total)		
15.	thallium (total)		
16.	zinc (total)		
17.	acenaphthene		<u> </u>
18.	acenaphthylene		
19.	acrolein		
20.	acrylonitrile		
21.	aldrin		
22.	anthracene		
23.	benzene		
24.	benzidine		
25.	benzo (a) anthracene		
26.	benzo (a) pyrene		
27.	benzo (b) fluoranthene		
28.	benza (g,h,i) perylene		
29.	benzo (k) fluoranthene		
30.	a-BHC (alpha)		
31.	b-BHC (beta)		
32.	d-BHC (delta)		
33.	g-BHC* (gamma)		
34.	bis (2-chloroethyl) ether		
35.	bis (2-chloroethoxy) methane		
36.	bis (2-chloroisopropyl) ether		
37.	bis (chloromethyl) ether	( (	ĺ
. 1		1 1	

ITEM NO.	CHEMICAL COMPOUND		SUSPECTED PRESENT	KNOWN
38.	bis (2-ethylhexyl) phthalate			
39.	bromodichloromethane			]
40.	bromoform			
41.	bromomethane			
42.	4-bromophenylphenyl ether			_
43.	butylbenzyl phthalate			
44.	carbon tetrachloride			
45.	chlordane			
46.	4-chloro-3-methylphenol			
47.	chlorobenzene			
48.	chloroethane	-		
49.	2-chloroethylvinyl ether			
50.	chlorotorm			<del></del>
51.	chloromethane	_		
52.	2-chloronaphthalene			
53.	2-chlorophenol			
54.	4-chlorophenylphenyl ether	<del></del>		
55.	chrysene	$-\dot{+}$		
56.	4,4' - DDD	一十		
57.	4,4' - DDE			
58.	4.4' · DDT	-+		
59.	dibenzo (a,h) anthracene			
60.	dibromochloromethane	_		
61.	1, 2-dichlorobenzene			
62.	1, 3-dichlorobenzene	$\neg \uparrow$		
63.	1, 4-dichlorobenzene			
64.	3, 3'-dichlorobenzidine			
65.	dichlorodifluoromethane	_		
66.	1,1-dichloroethane			
67.	1, 2-dichloroethane			
68.	1, 1-dichloroethene			
69.	trans-1, 2-dichloroethene		$\neg$	
70.	2, 4-dichlorophenol			
71.	1, 2-dichloropropane			
72.	(cis & trans) 1, 3-dichloro-			
	propene	1		
73.	dieldrin			
74.	diethyl phthalate			
75.	2, 4-dimethylphenol	$\neg \vdash$	- 1	
L				}

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## METROPOLITAN DISTRICT COMMISSION Industrial User Permit Application

Industry Name:	Emerson & Cuming
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Section 1. - Characteristics of Discharges (Cont'd)

Chem	ical Compound Table (Cont'd):			_	
ITEM NO.	CHEMICAL COMPOUND	SUSPECTED	PRESENT	KNOWN	PRESENT
76.	dimethyl phthalate				
77.	di-n-butyl phthalate	Γ			
78.	di-n-octyl phthalate				
79.	4, 6-dinitro-2-methylphenol				
80.	2, 4-dinitrophenol				_
81.	2, 4-dinitrotoluene				
82.	2, 6-dinitrotoluene				
83.	1, 2-diphenylhydrazine	Г			
84.	endosulfan I	Ι			
85.	endosulfan II				
86.	endosulfan sulfate				
87.	endrin				
88.	endrin aldehyde				
89.	ethylbenzen <b>e</b>				
90.	fluoranthene	L			
91.	fluorene	_			_
92.	heptachlor				
93.	heptachlor epoxide				
94.	hexachlorobenzene				
95,	hexachlorobutadiene				
96.	hexachlorocyclopenta-		ı		
	diene		_		
97.	hexachloroethane				
98.	indeno (1,2,3-cd) pyrene	L			
99.	isophorone	<u> </u>	_	_	
100.	methylene chloride	L_	_		
101.	naphthalene	<u> </u>	_		
102.	\$				
103.	2-nitrophenal				

		· · · · ·	
ITEM NO.	CHEMICAL COMPOUND	SUSPECTED PRESENT	KNOWN
104.	4-nitrophenol	L	
105.	n-nitrosodimethylamine	L	
106.	n-nitrosodiphenylamine		6
107.	n-nitrosodiphenylamine		
108.	PCB-1016		
109.	. PCB-1221		
110.	PCB-1232		
111.	PCB-1242	L	
112.	PCB-1248		
113.	PCB-1254		
114.	PCB-1260		
115.	pentachlorophen <b>o</b> l		
116.	phenanthren <b>e</b>		
117.	phenol		
118.	pyrene		
119.	2,3,7,8-tetrachlorodi-		
	benzo-p-dioxin		
120.	1,1,2,2-tetrachloroethane		
121.	tetrachioroethene		
122.	toluene .		
123.	toxaphen <b>e</b>		
124.	1,2,4-trichlorobenzene		
125.	1,1,1-trichloroethane		
126.	1,1,2-trichloroethane		
127.			
128.	trichlorofluoromethane	!	
129.	2,4,6-trichlorophenol		
130.	vinyl chloride		

3. Please list and provide the average concentration in discharged wastewater. If concentration is not known indicate by "-" (attach additional sheets if needed). Include all chemical compounds "Known Present" in the previous section.

ITEM NO.	CHEMICAL COMPOUND	ANNUAL USAGE (LBS)	DISCHARGE CONCEN- TRATION	ITEM NO.	CHEMICAL <u>COM</u> POUND	ANNUAL USAGE (LBS)	DISCHARGE CONCEN- TRATION
	BOD5					-	
	Total Suspended Solids						
	Settleable Solids						
	Dissolved Solids						
	рH				·		
						·	

# **EML. RON**

W.R. Grace & Co.

Canton, Massachusetts 02021 Telephone (617) 828-3300

November 16, 1984

RECEIVED BY

Mr. Richard Chalpin
Acting Regional Environmental Engineer
Metropolitan Boston Northeast Region Office
Department of Environmental Quality Engineering
5 Commonwealth Avenue
Woburn, Massachusetts 01801

NUV 26 1364

LEGAL DEPARTMENT CAMBRIDGE, MA

Lm.Olloo

Dear Mr. Chalpin:

Per request of Mr. David Erikson (DEQE) I am sending to you the following:

- 1.) A copy of the Camp Dresser & McKee, Inc. Audit Report of January, 1983 as transmitted to the DEQE (Attn: Mr. S. Lipman) on January 24, 1983.
- 2.) A copy of my memo accompanying the CDM report addressing and commenting on the various issues.
- 3.) A copy of a letter from the U.S. EPA acknowleding receipt of an NPDES Permit Application dated June 13, 1984.
- 4.) A current statement of progress/status of these issues.

Upon review and evaluation of this information, I would be pleased to have you visit Emerson & Cuming's 59 Walpole Street facility for a tour and discussion of these issues. By copy of this letter I would also invite Gina McCarthy (Canton Health) at such time.

I believe that based on our implementation of various projects that have occurred during 1982-1984 to address these environmental concerns; the matter can be laid to rest.

Sincerely,

Randolph M. Olson Plant Manager

RMO/dlg attachments

cc: Mr. David Erikson - DEQE (Woburn)
Ms. Gina McCarthy - Canton Health Dept.

#### STATUS OF ENVIRONMENTAL ANALYSIS FOLLOW-UP BY EMERSON & CUMING

1. Seal all grates, trenches, drains and floor accesses from the plant to the underground trenches and raceway.

This project has been completed recently at a cost of approximately \$6,000. To the best of our knowledge, these accesses are all sealed.

2. Permanently seal entrance to the raceway at the pond with a concrete barrier.

This project was completed this past Spring at a cost of approximately \$2,500. Some reworking of this barrier was done following the heavy rains and the current sepage through the raceway entrance appears negligible.

3. Remove the inert macrosphere and microsphere debris from the under floor trenches and raceway areas and seal floors.

This was completed last summer (1983) at a cost of approximately \$7,000. The debris has since been properly disposed of and secured.

4. Repair and seal steam condensate system to prevent leakage to raceway.

A project to repipe and install a new condensate return system (tanks and pump) was completed early 1984 at a cost of \$5,500. This condensate is now returned to the main boiler.

5. Pave ground along the Walpole Street side of building to divert and seal runoff away from the building foundation.

This project was completed during mid 1983 at a cost of \$10,000. The area was graded, graveled, hot top paved up to the building and pitched to an asphalt berm along the street. Run off now flows to the "gutter" by the street to the street catch basins. Groundwater no longer seeps through the foundation of the building.

6. Pave and dike bulk resin tank truck unloading area.

This project was completed mid 1983 at a cost of \$2,000 where the area was grade, graveled and hot top paved to the bulk tank walls and flush to adjacent hop top. The area was not diked because it was not practical. However, the nearby catch basins were closed and sealed off.

7. Dike outdoor drum storage area to preclude run-off to river.

This project was complete mid 1983 at a cost of \$1,500 and in use for most of a year. Since then storage of these drummed materials this has been decreased to the point where the drums can and are stored within the plant on a sealed concrete floor.

8. Install roof over the hazardous waste storage area to minimize rain accumulation.

This project was completed late 1983 at a cost of \$10,000. Early 1984 we changed our EPA status from Storage Facility and Generator to just Generator. As such we ship waste as it is generated within the 90 day limit. Further, during the summer of 1984, a trucker "drove through" this roof demolishing it. As a result, we intend to install a small waste storage area within the building to handle any small accumulation of waste waiting shipment.

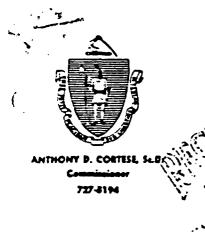
9. The area under three large solution holding tanks within the building has been diked and the floor seal such that any potential leak or spill could be contained.

This project cost \$1,800 and was completed mid 1983.

- 10. Drip pans are normally used under "active" material drums.
- 11. The handling procedures for catalyzed resin waste is completely in order. The resin is collected in steel drums, the methylene chloride separated and drained to chemical waste drums, the resin is oven cured, taken out of the drum, broken up and loaded into the BFI dumpster for disposal. Representative samples of this cured resin have been provided to BFI for any desired analysis.
- Regular sweeping of the yard area has been and is a normal procedure.

- 13. The samples of "white floc" taken from beyond the raceway discharge to be biological and occur in various other locations nearby in slow moving water.
- 14. As previously mentioned, drummed material storage has been decreased and storage moved into the plant.
- 15. The installation of a roof over the diked bulk tank storage area was deemed unnecessary, impractical and uneconomical and would not inherently benefit "environmental concerns." Normal accumulation of rainwater into the diked pad is negligible.
- 16. Non-contact cooling water and sump collected groundwater penetration is now collected and pumped via enclosed piping to an enclosed collection sump where it is overflowed into the raceway for discharge to the river. This is consistent with MDC Sewage regulations and we have received acknowledgement from the U.S. EPA for an acceptable NPDES permit application.
- 17. The MDC Sewerage Division has inspected our premises during October 1984 and was very pleased with the situation.
- 18. Various water samples have been taken in and around the premise and results showed nother unusual or abnormal for metals, COD, BOD and organics.

APPENDIX A



The Commonwealth of Massachusetts

Department of Environmental Quality Engineering

Motropolitan Boston - Northeast Region

223 Now Boston Street Wobern MSI 01801

November 5, 1982

Emerson & Cuming
Dewey & Almy Chemical Division
W.R. Garce & Co.
59 Walpole Street
Canton, MA 02021

RE: CANTON-Request for Engineering Report

Attention: Mr. Randolph M. Olson, Plant Manager

#### Gentlemen:

On November 2, 1982 an Engineer from the Metropolitan Boston/Northeast Region of the Department of Environmental Quality Engineering, Division of Water Pollution Control and Ms. Regina A. McCarthy of the Canton Board of Health made an inspection of your facility at 59 Walpole Street, Canton. Also present during the inspection was Mr. Jay McNeff, Plant Engineer and Mr. Randolph Olson, Plant Manager.

The purpose of the inspection was to investigate the drainage patterns both inside and outside the plant as they relate to any existing or potential discharge of pollutants to an existing raceway which flows under the building and property. The raceway is diverted from the East Branch River and discharges back to the river through a 24 inch concrete culvert pipe.

The inspection revealed the presence of several floor drains inside the plant and two storm drains outside the plant with discharge connections to the raceway. An observation of the raceway discharge pipe to the river showed no visible evidence of pollutants. However, the presence of a Hazardous Waste storage area, a raw chemical barrel storage area and a bulk tank storage area outside the plant and the use of these materials inside the plant present a potential hazard in the instance of a chemical spill entering the drainage flow of the facility, or the unauthorized use of these drains for the disposal of waste materials. In the case of an incident, Canton's downstream public water supply wells may be affected. The Department therefore is of the opinion that appropriate steps be taken as follows:

- On or before November 29, 1982 a professional engineer, registered in the Commonwealth shall be retained by you to prepare a report to identify the location and use of all drains/discharges to the raceway, the East Branch River and the municipal sewer.
- 2. The report shall evaluate the potential for pollutants to enter and

Emerson & Cuming Page 2 November 10, 1982

drain on the East Branch River resulting from the storage, spillage or mishandling of hazardous waste, raw materials as well as the use of these materials during the manufacturing process.

- 3. The report shall include the past history of the use and purpose of the raceway, any on site disposal practices, spills of any kind and a listing of materials involved. Copies of any sampling data shall be included.
- 4. The report shall further include a description of any actions already taken and/or recommendations for steps to be taken toward preventing pollutants from entering the raceway or the East Branch River from any of the above activities.
- 5. On or before January 3, 1983 the report shall be submitted to the Department for review. After the report has been reviewed a detailed schedule for implementation of those actions deemed appropriate by the Department will be issued.

The Department also requests that you notify this office in writing when an Engineer has been retained and the name of the firm or individual hired.

If you should have any questions regarding this matter you may contact me or Mr. David G. Erekson at 935-2160.

Very truly yours,

Steven G. Lipman, P.E.

Heren D. Jepin

Deputy Regional Environmental Engineer

SGL/DGE/jb

cc: Regina McCarthy, Canton Board of Helath, Town Hall, Canton, MA 0202!

APPENDIX B

CDM₃

environmental engineers, scientists, planners, & management consultants

WR/IP-2103

JUN 13 1984

Randolph M. Olson, Plant Manager Emerson & Cuming 59 Walpole Street Canton, MA 02021

Re: NPDES Application No.

Dear Mr. Olson:

Your application for a National Pollutant Discharge Elimination System (NPDES) permit has been reviewed and appears to be complete. You may be contacted for additional information as the permit is developed, should it be necessary to clarify, modify or supplement any previously submitted information. By copy of this letter, your State Water Pollution Control Agency is being furnished a copy of your complete application for certification pursuant to Section 401(a)(1) of the Clean Water Act, as amended, 33 U.S.C §1341(a)(1).

A draft permit and statement of basis or fact sheet will be prepared by this office and forwarded to you for comment prior to the opening of the public comment period. The draft permit will then be publicly noticed and forwarded for state certification if certification has not previously been received on the application. If it is deemed necessary, a public hearing will be held, in which case, the comment period will be extended until the close of the hearing. After the close of the public comment period, your final permit will be issued providing no new substantial questions are raised. If new questions develop during the comment period, it may be necessary to draft a new permit, revise the statement of basis or fact sheet and/or reopen the public comment period.

The waiver of testing requirements requested in your letter of May 8, 1984 for Outfall 001 has been granted for the following parameters: BOD, COD, TOC, TSS and Ammonia.

Should you have any questions concerning the permit issuance process, don't hesitate to contact Nanci Siciliano, of my staff. She may be reached at 617/223-3940.

Sincerely yours,

Edward K. McSweeney, Chief

Compliance Branch

cc: State Water Pollution Control Agency w/encl.

The Commonwealth of Massachusetts Department of Environmental Quality Engineering Motorpolitan Boston - Northeast Region

2923 New Boston Street Woburn Most 01801

November 5, 1982

Emerson & Cuming Dewey & Almy Chemical Division W.R. Garce & Co. 59 Walpole Street Canton, MA 02021

RE: CANTON-Request for Engineering Report

Attention: Mr. Randolph M. Olson, Plant Manager

Gentlemen:

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Emerson & Cuming Page 2 November 10, 1982

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- 4. The report shall further include a description of any actions already taken and/or recommendations for steps to be taken toward preventing pollutants from entering the raceway or the East Branch River from any of the above activities.
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The Department also requests that you notify this office in writing when an Engineer has been retained and the name of the firm or individual hired.

If you should have any questions regarding this matter you may contact me or Mr. David G. Erekson at 935-2160.

Yery truly yours,

Steven G. Lipman, P.E.

Steven N. Lyin

Deputy Regional Environmental Engineer

SGL/DGE/jb

cc: Regina McCarthy, Canton Board of Helath, Town Hall, Canton, MA 02021

GRACE

W. R. Grace & Co. 62 Whittemore Avenue Cambridge, MA 02140

(617) 876-1400

February 1, 1989

U.S. Environmental Protection Agency, Region 1 Waste Management Division Post Office Box 6222 Boston, MA 02114

RE:

W.R. Grace & Co. Walpole Street, Canton, E.P.A. I.D. Number MAD000361709

#### Dear Sir or Madam:

This letter and enclosed documents are submitted on behalf of W.R. Grace & Co. (Grace) in response to a request for information dated November 25, 1988 and supplemented by a letter dated December 30, 1988 (together hereinafter referred to as the "request"), from Mr. Merrill S. Hohman, Director, Waste Management Division, relating to the above-referenced Grace operations in Canton, Massachusetts. The letter dated December 30, 1988 extended the time for Grace to respond to this request until February 1, 1989.

### Preliminary Statement

Grace will respond to the EPA information request in accordance with its understanding of that request.

Nevertheless, Grace wishes to note that by doing so it does not in any way concede or admit that EPA has authority or jurisdiction to require corrective action in connection with any of its Canton operations. For the reasons described below, among others, Grace believes that it is not subject to EPA's corrective action permitting or enforcement authority.

USEPA, Region 1 Page 2 February 1, 1989

We understand from those two letters that EPA's intent in requesting answers to these questions is to identify any releases of hazardous waste or constituents from facilities qualifying for interim status under RCRA Section 3005 that treat, store for 90 days or more, or dispose of hazardous waste, including so-called Solid Waste Management Units (SWMUs), as well as releases of hazardous waste or constituents from facilities which had interim status or should have had interim status as a result of their treatment, storage or disposal activities. We further understand that EPA seeks this information in order to determine the need for response or for enforcement of the corrective action provision of RCRA, as added by the Hazardous and Solid Waste Amendments of 1984 (HSWA), RCRA Sections 3004(u) and 3008.

To the extent that the request is premised on the proposition that the Grace operations are subject to RCRA corrective action, Grace disputes that premise. Simply put, under the Hazardous and Solid Waste Amendments of 1984 (HSWA), EPA may impose corrective action requirements in two circumstances. The first is where there have been releases of hazardous wastes or constituents from any solid waste management unit at a facility "seeking a permit" under RCRA Section 3005(c), 42 U.S.C. Section 6925(c). See RCRA Section 3004(u), 42 U.S.C. Section 6924(u). Because Grace is not seeking a permit under Section 3005(c), as described below, Section 3004(u) does not apply.

Corrective action may also be required under RCRA Section 3008(h), 42 U.S.C. Section 6928(h), where there has been a release from "a facility authorized to operate under Section 3005(e) of this subtitle", 42 U.S.C. Section 6925(e). Grace has not been authorized to operate as an interim status facility since at least 1983, when it withdrew its Part A permit application, as described below. Therefore, this section also does not apply.

The above-referenced Grace operation is not a RCRA-permitted or interim status facility. Grace did submit to EPA a Notification of Hazardous Waste Activity, and under date of November 18, 1980 a General information form, EPA Form 3510-1 (6/80), and a Part A Hazardous Waste Permit Application, EPA Form 3510-3 (6/80), with respect to its operations then existing in Canton. However, on March 29, 1984 Grace submitted to EPA a change of status request, in effect withdrawing the Part A permit applications as of that date. A copy of the letter

USEPA, Region 1 Page 3 February 1, 1989

requesting change of status is enclosed herewith. In addition, under date of February 10, 1984 Grace submitted to DEQE on a form approved by DEQE for that purpose a signed certification confirming, among other things, that thenceforward it would not store, treat, or dispose of hazardous waste. A copy of this certification is enclosed herewith. Grace is advised both by the DEQE Division of Hazardous Waste and by EPA that Grace's change of status request for the Canton facility was granted by DEQE and approved by EPA. We are unable at this time to locate the official documentation confirming this, we will provide you with copies as soon as they have been located

Since Massachusetts has (then and now) a delegated program under RCRA EPA approval was not required for a change of status. This was confirmed in the Memorandum of Understanding (MOU) dated March 25, 1986, which specifies procedures for certain federal/state interactions under RCRA. These procedures state that DEQE had authority in the first instance to approve a change in status. Moreover, the MOU states that when DEQE notifies EPA of a decision to approve a change in status, EPA must inform DEQE within two weeks of any disagreement with DEQE's decision; otherwise DEQE's decision stands. Grace is not aware that EPA ever expressed any disagreement with DEQE's decision to approve Grace's change of status. Therefore, since DEQE recognized Grace's change of status and EPA in effect approved it, Grace has not been authorized to operate as an interim status facility since 1984, and it is not subject to the RCRA corrective action provision.

Since neither DEQE nor EPA had taken any administrative action to grant Grace's Part A permit application, we understand that Grace's withdrawal of that application was effective in any event to terminate its previous interim status for its operations covered by the Part A permit application as of the date of withdrawal, which was prior to the enactment of the corrective action provision of HSWA. In short, Grace's Canton operation does not meet the definition of "facility" set forth in the request, because those operations are not conducted on property " on which units subject to RCRA permitting are located."

#### Response

With respect to sites which are or have been undergoing investigative or remediation procedures pursuant to voluntary action, notices of responsibility from governmental bodies, orders or similar proceedings, Grace understands from conversations between its counsel and representatives of EPA

USEPA, Region 1 Page 4 February 1, 1989

that narrative answers to the questions set forth in the information request are not required. We understand that EPA will instead accept, in lieu of such answers, the incorporation by reference in this response of reports previously submitted to EPA, or the transmittal of copies of reports submitted to other governmental bodies. Consequently, in response to this response Grace submits copies of the following documents:

- 1. Olson to EPA, March 29, 1984 Request of change of status from hazardous waste storage facility to hazardous waste generator.
- Certificate signed by Olson to DEQE, dated February 10,
   1984 re. change of status.
- 3. R. Joyce to S. Johnson (DEQE), dated Sept. 16, 1988 cover letter for Rizzo Associates revised Scope of Services for Phase I Site Investigation.
- 4. Revised Scope of Services for Phase I Site Investigation Rozzo Associates, dated August 8, 1988.
- 5. R. Joyce to R. Chalpin, dated Feb. 11, 1988 Response to DEQE request for technical information pursuant to G.L. c. 21E regarding the Oct. 9, 1987 discovery of oily water and soil.

#### Attachments:

Table I. List of Hazardous Waste Manifests

Att. I: Copies of Waste Manifests from E & C to

Jet-Line

Att. 2. Copies of Waste Manifests from Jet-Line to Sablex-Canada.

Att. 3: Waste Analyses

Att. 4: Hazardous Waste Manifests and Analyses Letter R. Joyce to S. Roy, dated Dec. 29, 1987 - re: Field Sampling results.

Figure I: Map with drum storage areas noted.

- 6. R. Chalpin (DEQE) to P. Ciriello, dated January 13, 1988 Re: Notice of Responsibility/Request for Rechnical Information Pursuant to M.G.L. c. 21E regarding the Oct. 9, and Nov. 9, 1987 discovery of oily water and soil.
- 7. Report prepared by Haley and Aldrich, dated December 28, 1987 Vadose Zone Screening Study (report prepared by Grace contractor as part of DEQE investigation of groundwater contamination of the Upper Neponset River Valley Aquifer).

USEPA, Region 1 Page 5 February 1, 1989

- 8. P. Deese (DEQE) to J. F. Murphy, Jr., dated Oct. 1, 1987 Re: Site Investigations, Upper Neponset Valley Aquifer.
- 9. G. Rowe to Edward Lukaszewicz (Canton Conservation Commission), dated April 13, 1987 Response to Enforcement

Order issued March 24, 1987.

Att: J. Davey, Enpro Services to R. Olson, dated April 6, 1987 - Regarding Oil Staining at the facility.

10. M. Stoler to Canotn Board of Health, dated March 24, 1987
Response to Board's actions at March 10, 1987 meeting (allegation of storage of drums of hazardous materials.

Att: Affidavit of Charles Moore
Affidavit of Graham Rowe
Documents pertaining to removal of empty drums.

- 11. Canton Conservation Commission to G. Rowe, dated March 24, 1987 Enforcement Order.
- 12. R. Olson to G. Winterson, dated March 5, 1985 Re: Canton Health Department Review of Camp, Dresser & McKee Audit. Att: 1984 Water testing results.
- 13. W. Krohl (DEQE) to R. Olson, dated March 1, 1985 Spill Control Audit at Plant #2 (Engineering Report).
- 14. R. Olson t R. Chaplin (DEQE), dated Nov. 16, 1984 cover letter.
  - Att. Camp Dresser & McKee Audit Report dated January, 1983.
    R. Olson memo accompanying CDM Report.
    Letter from USEPA acknowledging receipt of NPDES
    Permit Application.
    Statement of progress/status of implementing
    recommendations.
- 15. S. Lipman (DEQE) to R. Olson, dated Nov. 5, 1982 Request for Engineering Report.
- 16. Facility Map

Unless otherwise indicated, this response is not made on the basis of personal knowledge. This response was prepared by or with the assistance of agents, employees, representatives, or attorneys of Grace, or others believed to have relevant information, and with the advice of counsel, which has been relied upon herein. The answers set forth USEPA, Region 1 Page 6 February 1, 1989

herein, subject to inadvertent or undiscovered errors or omissions, are based on and therefore necessarily limited by the records and information still in existence, presently recollected, thus far discovered in the course of the preparation of these answers, and currently available to Grace. Grace reserves its right to supplement this response if discovery of additional information makes such supplementation appropriate.

The current Grace facility contact person is Randolph Olson, Plant Manager (617) 821-4250.

Very truly yours,

Marcia Seeler

Assistant Environmental Counsel

Canton

Enerson & Cuming Unit Dewey & Almy Chemical Div. W. R. Grace & Co. 59 Walpole Street Canton, Mass. 02021

Murch 29, 1984,

Jacob Edwards State Waste Programs U.S. EPA, Room 1903 JFK Federal Building Boston, Mass. 02203

#### Mr Edwards:

Emerson & Cuming formally requests to change our status of Hazardous Waste Storage Facility to Hazardous Waste Generator. Our EPA I.D. Number is MAD 000 361 709. When our Company originally filed its application in November, 1980, the following three process codes were used:

SO2 - Tank Storage 600 gallons

TO3 - Treatment by incineration 20 gallons per hour

SO1 - Drum Storage 1000 gallons

The person who filled out this application is no longer with the Company and was apparently in error when describing our hazardous waste process. We have never incinerated a hazardous waste to the best of my knowledge and have never stored a hazardous waste in a tank. We only accumulate our waste in 55 gallon drums and periodically ship it out to a licensed hazardous waste facility. Our only change is that we will ship all accumulated waste within 90 days.

Thus, Emerson & Cuming, 59 Walpole Street, Canton, Mass., EPA
I.D. Number MAD 000 361 709, formally requests to change from
Storage Facility status to Generator status.

Labely M. Ola-

Randolph M. Olson Plant Manager

## CERTIFICATION

•			•
I,	RANDOLPH M. OLSON	,PLANT MANAGER	, hereby
_	EMERSON & CUMING UNIT		000 361 709 , which
	(name of company)	(EPA	1.D. #)
notified the	U.S. Environmental Protect	ion Agency ("EPA") that	it treats, stores and/or
disposes of	hazardous waste, at all time	s from this date forwar	d (1) will not accumulate
any hazardou	s waste for more than 90 day	ys; (2) will accumulate	: hazardous waste in
compliance w	with 310 CMR 30.340; (3) will	l not store, treat, or	dispose of hazardous
waste; and (	(4) will comply with all other	er applicable requireme	ents of 310 CMR 30.000.
I under	estand that the Department o	f Environmental Quality	Engineering is deferring
	y of the financial responsite EMERSON & CUMING UNIT, CHEMICAL DIV., W. R. GR	DEWEY & ALMY	
. (	(name of company)		
EMERSON & (	or change of status and this CUMING UNIT, DEWEY & ALM IV., W. R. GRACE & CO.	Υ	
(name of co	ompany)		•
I certi	ify under penalty of law tha	t I have personally exa	mined and am familiar
with the inf	formation submitted in this	document and all attach	ments and that, based
on my inquir	y of those individuals immed	diately responsible for	obtaining the
information.	I believe that the informat	tion is true, accurate	and complete. I am

aware that there are significant penalties for submitting false information, including

12/87 (Signature)

59 WALPOLE ST. CANTON, MASS. 02021

possible fines and imprisonment.

RANDOLPH M. OLSON

FEB. 10, 1984

(Name typewritten)

## GRACE

#### **Polyfibron Division**

W.R. Grace & Co. 55 Hayden Avenue Lexington, Mass. 02173

(617) 861-6600

September 16, 1988

Stephen M. Johnson
Department of Environmental Quality Engineering
5 Commonwealth Avenue
Woburn, MA 01801

Dear Steve:

Attached is the revised Scope of Services for the Phase I Site Investigation (ATT:1) prepared by Rizzo Associates, Inc. for the Emerson & Cuming facility located at 59 Walpole Street in Canton, Massachusetts. Revisions to the proposal are consequent to our meeting on July 19, 1988. We are confident that each of the concerns outlined by you during our July meeting have been appropriately addressed in the Revision and in Rizzo's cover letter to James F. Murphy, Jr. (ATT: 2)

Your expeditious response to our submittal is requested as we are anxious to initiate and complete the site assessment prior to the onset of winter.

Sincerely,

Rosanne M. Jource
Environmental Engineer

RMJ:kc

ATT:2

cc: J.F. Murphy, Jr.
D. Kronenberg
G.W. Rowe
R.M. Olson

## ENGINEERS AND ENVIRONMENTAL SCIENTISTS

235 West Central Street, Natick, MA 01760 (508) 651-3401 FAX (508) 651-1189

August 8, 1988

Mr. James F. Murphy, Jr. Assistant Vice President W.R. Grace & Company 55 Hayden Avenue Lexington, MA 02173

Re: Revisions to June 1, 1988 Technical Scope of Services, Canton Site (837-01)

Dear Mr. Murphy:

As per our meeting of August 2, 1988 I have revised the Technical Scope of Services for the Canton facility to incorporate comments from the Department of Environmental Quality Engineering (DEQE). Specific revisions and comments are presented below.

- 1. All soil borings to be completed as monitoring wells will be advanced to refusal or the first confining unit below the water table, whichever is less. This revision is reflected in Task 2 and Appendix B.
- Task 3 specifies the collection of split spoon soil samples continuously (2-foot intervals) in an area of suspected PCB presence. Task 2 specifies the collection of split spoon soil samples at 5-foot intervals (collection of 2 feet of samples/5 feet of lineage) in areas throughout the site where contamination is neither suspected or confirmed. believe this represents adequate coverage to physically classify soil stratigraphy and screen for the potential presence of volatile organic compounds (VOCs). Collection of soil samples on a continuous basis is not technically warranted and cost prohibitive for a preliminary assessment of a facility which lacks analytical evidence to indicate the presence of VOC in soils or groundwater. For a soil boring/well installation program of this magnitude we would anticipate a minimum of one additional drilling day to perform continuous sampling corresponding to an increase in project cost of \$2,000 to \$2,500.
- 3. The installation of RIZ-1 and RIZ-6 will provide information relative to upgradient sources of contamination. In the event constituents were detected which have not been used at the facility, an upgradient

Page Two Mr. James F. Murphy, Jr. August 8, 1988

source would be suspected. If no constituents are detected in these wells, an upgradient source for similar constituents detected in downgradient wells would be unlikely or the transport mechanism may be other than groundwater flow (i.e. surface runoff drains). Therefore, upgradient information is provided by the installation of these and all monitoring wells.

- 4. A maximum screened interval of twenty feet will be utilized for shallow overburden monitoring wells. This revision has been noted in Task 2 and Appendix B. The screened interval will be determined based on the stratigraphy identified during the installation of the soil borings. The interval will extend from the water table to a maximum of twenty feet or refusal or the first confining unit encountered below the water table, whichever is less.
- 5. Instruments utilized to screen soil samples will be capable of detecting 1,1,1-trichloroethane (TCA), trichloroethylene (TCE) and methylene chloride. This revision has been incorporated into Task 2 and Appendix A.
- 6. A nested well series will be placed at location RIZ-3, RIZ-4, RIZ-5 or RIZ-7 if the saturated thickness is greater than 20 feet above refusal or the first confining unit. This revision has been incorporated into Task 2 and Appendix B relative to the construction of a deep overburden well.
- 7. A composite sediment sample will be collected from the vicinity of the tail race as identified in Task 3 and laboratory analyzed for the presence of PCBs.
- 8. VOC analyses will include hazardous substance list (HSL) compounds. Analysis of additional peaks is unwarranted due to the nature of this investigation. The purpose for conducting this investigation is to determine if the W.R. Grace site is responsible for observed TCA, TCE, methylene chloride and/or mercury contamination at the Canton well #7. Additional constituents, other than the HSL compounds, have not been identified in this water supply well. In addition, library searches conducted to identify additional peaks are often tentative and less than reliable. Therefore, the Scope of Services has been prepared to address specific concerns of the DEQE and is considered to be comprehensive for the purpose of identifying source areas for the compound identified at the Canton well #7.

Page Three Mr. James F. Murphy, Jr. August 8, 1988

- 9. Monitoring well and surface water elevations will be surveyed to a mean sea level (MSL) datum.
- 10. Insitu hydraulic conductivity tests will be conducted if constituents of concern are identified by laboratory analysis above applicable water quality standards. If constituents are not detected at concentrations above applicable standards, this information will not be required.
- 11. The head space analysis in Appendix B has been modified to reflect the DEQE guidelines.
- 12. Two additional monitoring wells have been incorporated into the Scope of Services. Monitoring well RIZ-7 will be installed north of the race way location between monitoring wells RIZ-4 and RIZ-5. The location of monitoring wells RIZ-3, RIZ-4, RIZ-5 and RIZ-7 will be adjusted for approximately equidistant spacing.

Monitoring well RIZ-8 will be installed north of the resins dike storage area in the vicinity of Haley & Aldrich's soil gas sampling point 7.

One additional modification has been made to the Scope of Services. The location of the area of potential PCB soils has been relocated to the intersection of the surface runoff drain and the race way. This location was incorrectly identified on the site plan submitted with the June 1, 1988 Scope of Services.

Rizzo Associates is pleased to provide these revisions to the technical Scope of Services. We are confident they will result in a comprehensive evaluation of the site for potential sources of constituents detected in Canton well #7 and address concerns relative to the potential presence of PCBs in site soils.

If you have any questions regarding the revised Scope of Work or comments within this correspondence please do not hesitate to contact me.

Very truly yours,

John E. Adams Project Manager

JEA/cc/2379H

Attachments

## ENGINEERS AND ENVIRONMENTAL SCIENTISTS

PHASE I SITE INVESTIGATION

Proposed Scope of Services

W.R. Grace Facility Canton, Massachusetts

August 8, 1988

## ENGINEERS AND ENVIRONMENTAL SCIENTISTS

233 West Central Street, Natick, MA 01760 (508) 651-3401 FAX (508) 651-1189

August 8, 1988

Mr. James F. Murphy, Jr. Assistant Vice President W.R. Grace & Company 55 Hayden Avenue Lexington, MA 02173

Re: Technical Scope of Services Canton Site (837-01)

Dear Mr. Murphy:

Rizzo Associates is pleased to submit this technical scope of services, prepared to address potential environmental concerns at the W.R. Grace facility located at 59 Walpole Street in Canton, Massachusetts (the Site). The technical scope of services is in response to concerns expressed by the Department of Environmental Quality Engineering (DEQE) over potential soil and/or groundwater contamination which may be present at the The Site was placed on the "Locations to be Investigated" list by the DEQE on April 15, 1987. W.R. Grace was formally notified that the Site had been placed on this list in a letter from James C. Coleman of the DEQE dated April 11, 1988. The current disposition of the Site as of the July 15, 1988 list indicates the Site is the location of a confirmed release of oil or hazardous materials. Therefore, based on the status of the Site, the DEQE has required further investigation to determine if previous actions which have been implemented by W.R. Grace are sufficient to mitigate contaminants originating from areas of confirmed or suspected releases.

Rizzo Associates has conducted a Site visit and researched available information in the W.R. Grace and DEQE files relative to potential environmental problems. In addition, discussions were conducted between John Adams of Rizzo Associates and Stephen Johnson of the DEQE to ascertain specific areas which DEQE requires to be addressed by the technical scope of services.

#### Site Background

The Site consists of several acres bounded by Neponset Street, Walpole Street, Walpole Terrace and the East Branch of the Neponset River. The main plant area consists of an

approximately rectangular parcel, 850 feet by 250 feet in dimension trending northeast-southwest along Walpole Street as identified on the attached Site Plan. The topography of the Site slopes generally northwestward from Walpole Street at an elevation of 70 feet Mean Sea Level (MSL) to the East Branch at an elevation of about 50 feet MSL.

The East Branch flows to the east in the vicinity of the Site for approximately 2,000 feet, at which point it turns to the north and flows into the Neponset River approximately one mile from the Site. Three Town of Canton water supply wells are located within one mile of the Site and are identified on the Site locus map. Canton Well 7 is located approximately 2,000 feet northwest of the main building and Canton Wells 5 and 6 are located approximately 4,000 feet west of this location. In 1979, routine sampling of Canton Well 7 identified the presence of small quantities of trichloroethylene (TCE). The use of the well was subsequently discontinued. Periodic sampling has identified the presence of low concentrations of various volatile organic compounds (VOCs), including 1,1,1-trichloroethane (TCA), chloroform, bromodichloromethane and methylene chloride. Recent sampling results for the well in December 1986 indicated that no VOCs were detected in the monitoring well. However, analysis for priority pollutant metals indicated the presence of mercury at concentrations of 0.003 milligrams per liter (mg/1). The well remains closed at this time.

The DEQE initiated a study of the Neponset River Valley to identify potential sources of groundwater contamination and formulate a remedial action program to mitigate groundwater contamination in these areas. The study was conducted by SEA, Inc. of Cambridge, Massachusetts and a draft Phase II Hydrogeologic Evaluation and Testing Report has been submitted to the DEQE for review.

The report expresses concerns of two potential sources for the contamination of the Town of Canton Well 7 as the Neponset Valley Industrial Park and the Emerson & Cumings (W.R. Grace) Site. The implication of the Emerson & Cumings Site as a potential source of contamination to the Canton Well 7 is primarily responsible for current concerns by the DEQE relative to groundwater quality at the Site.

#### Site Visit

A Site visit was conducted by Mr. Adams on May 9, 1988 for the purpose of evaluating areas of previous releases and assessing the feasibility of implementation for a proposed field

investigation. Rosanne Joyce and Sharon Schuerfeld of W.R. Grace escorted Mr. Adams around the exterior of the facility. Randolph Olson was present during a portion of the Site visit.

The former handling and storage area for non-hazardous and hazardous materials and waste were identified during the site visit. Also located were areas where petroleum and/or hazardous materials were found or detected. Recent demolition and construction activities were also reviewed.

The Site is supplied by Town of Canton water and sewer connections. Previous to 1981, numerous cisterns are thought to have existed for disposal of sewage from restroom facilities throughout the plant. The final cistern was removed from service and the plant was connected to Town sewers in 1983. Although, the exact location of all cisterns is not known, they are expected to be in the vicinity of existing sewer connections.

The location of five areas of primary environmental concern were identified during the Site visit and subsequent discussions with DEQE and W.R. Grace personnel. These areas include a former drum storage area, an area previously remediated for the presence of oily soils, an area of suspected polychlorinated biphenyl (PCB) presence, an area tentatively identified as containing elevated concentrations of VOCs in the soil pore gas relative to surrounding locations, and a former solvent storage area. These areas are identified on the Site Plan.

The drum storage area, located along the northwest property boundary, was utilized for the storage of epoxy resins prior to 1984. During a November 1982 Spill Control Audit conducted by Camp Dresser & McKee (CDM), up to 200 drums were observed to be stored in this paved area of the Site. Emerson & Cumings diked this area in addition to reducing the number of drums stored as a result of CDM recommendations. The practice of storing drummed epoxy resins in this area was discontinued in late. During the period from 1984 to 1987, empty drums were accumulated and stored in this area prior to periodic removal by contractors to W.R. Grace. A soil pore gas investigation, conducted by Haley & Aldrich in 1987, detected the presence of low concentrations (less than 10 parts per billion [ppb]) of methylene chloride in this area. Elevated concentrations of methylene chloride were detected in the soil pore gas samples approximately 80 feet south and southwest of this location. Haley and Aldrich designated these as sample locations number 12 and 21 in their December 1987 Vadose Zone Screening Study.

An area of oily soils was encountered during building demolition activities in October 1987. A brick structure, which may represent a historic basement floor, was unearthed at a depth of approximately six to seven feet below the existing ground surface. Oily groundwater and approximately two cubic yards of oily soil were observed in proximity to this structure. To insure complete remediation of this area, a total of 3,800 gallons of oily water and 80 cubic yards of oily soil were removed from this location and disposed of in approved facilities. A 1927 Site Plan indicates a boiler room was present approximately 50 feet south of this location. The oil may be an artifact of leakage from boiler piping which predates ownership by Emerson & Cumings and W.R. Grace.

Excavation for a storm sewer in November 1987 identified the presence of oily soil and groundwater in the vicinity of the mill raceway at the western end of the Site. The area was characterized by the presence of assorted construction debris and products. Analyses of a soil sample collected from a thin oil stain horizon indicated the presence of PCB's at a concentration of 160 milligrams per kilogram (mg/kg). Oily water was pumped from the excavation to permit the installation of the storm water sewer. The oily water was disposed by Jetline, Inc. at an approved facility.

The aforementioned Haley & Aldrich soil gas investigation tentatively identified the presence of VOCs in the vicinity of the mill raceway outfall. Subsequent groundwater sampling failed to confirm the presence of VOCs and Haley & Aldrich concluded that the presence of VOCs in the soil pore gas was the result of an isolated release of methylene chloride or an incorrect identification with the field gas chromatograph. Low concentrations of VOCs (less than 10 ppb) were detected in soil pore gas samples collected 100 and 400 feet west of this location.

An exterior solvent storage area, utilized by W.R. Grace prior to 1985, was located at the southwest end of the Site. The area was paved and bermed and was secured by a locked cyclone fence covered by a roof structure. The practice of storing solvents in this area was discontinued in 1985 when a concrete flammable solvent room was constructed inside the plant structure. No reported releases of hazardous materials has occurred in the vicinity of this area.

### Scope of Services

A technical scope of services has been prepared which addresses the four areas identified as potential environmental concerns. The data required to evaluate the potential for the Site soils

and/or groundwater to be contributing to the VOCs detected in the Town of Canton Well #7 would be collected. The scope of services is consistent with guidelines established by the DEQE for Phase I site investigations. DEQE has requested a Phase I investigation of the Site. Specific tasks comprising the scope of services are identified below.

1. Site History. A complete Site history will be prepared for the W.R. Grace Canton facility. The history will include records of past and present owners/operators and uses of the facility, including industrial and manufacturing processes. A listing of types of oil and hazardous materials utilized at the facility will be compiled, including quantities used, treated, stored, disposed or generated through past or present uses at the facility. The past and present locations of oil and hazardous materials use and storage will be identified. Past and present waste disposal practices will be investigated. Existing or pending environmental permits will be reviewed. A brief description of past and present land uses for adjacent properties will be prepared.

These activities will be accomplished by interviewing State and local officials and reviewing available files at the Town of Canton Assessor's Office, Building Department, Clerk's Office, Board of Health, Engineering, Public Works and/or Fire Department. Site occupants will also be interviewed during a thorough Site inspection of the building premises. The Site inspection will be conducted prior to the initiation of field investigation activities to insure all areas of potential environmental concern have been identified during the initial review of available materials conducted for the preparation of this scope of services.

- 2. Installation of Monitoring Wells. The installation of six monitoring wells is proposed for the purpose of assessing the Site groundwater quality. The locations for the monitoring wells are identified on the Site Plan and have been selected to address areas of specific concern and provide an overall assessment of Site groundwater quality. The locations of each monitoring well and justification for well placement are identified below.
  - RIZ-1 will be located downgradient from a known cistern utilized for sanitary sewage disposal. The monitoring well will be used to assess potential discharges to the cistern and evaluate potential migration of contaminants onto the Site from upgradient sources.

- o RIZ-2 will be located immediately downgradient from the area where oily soil and groundwater were removed during construction activities in 1987. The monitoring well will be used to assess soil and groundwater quality downgradient from an identified release of petroleum products and to insure adequate remediation of the area has been accomplished.
- o RIZ-3 will be located in the former empty drum and epoxy resin storage area. Haley & Aldrich identified low concentrations of VOCs in the soil pore gas in this location. This monitoring well will be utilized to assess groundwater quality in this area.
- RIZ-4 will be located downgradient from an area of demolished and newly constructed plant facilities. Haley & Aldrich detected the presence of VOCs in the soil pore gas in this vicinity. Groundwater quality data will be utilized to evaluate potential exfiltration from the raceway and/or the presence of hazardous materials in the area.
- o RIZ-5 will be located in the western corner of the Site and will be installed to assess groundwater quality downgradient from the facility. This location is approximately 60 feet west of the location where soil was found to contain PCBs. The boring will be utilized to assess the potential extent of PCB in the soil. If PCBs are confirmed in the area of their suspected presence, then soil samples collected from this boring will be screened for the potential presence of PCB with a field test kit capable of detecting the presence of greater than 50 parts per million (ppm) of PCBs.
- o RIZ-6 will be located downgradient from the former hazardous materials storage area and in the vicinity of the Walpole Street entrance adjacent to the stormwater drain. Groundwater quality data will be utilized to assess potential migration of contaminants from off-site sources, including the exfiltration of contaminated storm drainage and/or migration along the backfill material of contaminated groundwater. In addition, containment of solvents within the storage structure may also be confirmed. The groundwater elevation data collected from this well will also be critical for establishing the definitive direction of groundwater flow.
- o RIZ-7 will be located east of the area of suspected PCB presence and north of the mill raceway. This well will be installed and constructed for similar purposes as monitoring well RIZ-5.

- o RIZ-8 will be located north of the resin-diked storge area and in the vicinity of Haley & Aldrich soil gas sampling point 7. This monitoring well will be installed to assess the integrity of the diked storage area and to evaluate overall groundwater quality in this vicinity of the facility.
- All monitoring wells will be installed in accordance 0 with the standard procedures outlined in Appendix A. Soil samples will be collected at five-foot intervals and screened for the potential presence of VOCs in the field utilizing a photoionization detector capable of detecting TCE, TCA and methylene chloride. borings will be advanced to the first confining unit below the water table or refusal, whichever is less. The stratigraphy in the vicinity of monitoring wells RIZ-3, RIZ-4, RIZ-5 and RIZ-7 will be evaluated relative to the installation of a nested monitoring well series. If the saturated thickness above the first confining unit or refusal is greater than twenty feet, a nested well series will be installed in one of these locations. The deeper well will consist of a five-foot screened interval separated from the shallow well screened interval by a minimum of five feet. deeper wll in the cluster will be backfilled utilizing a cement/bentonite grout above the bentonite seal. Monitoring wells will be constructed of 2-inch-diameter PVC with screened intervals from the water table to a depth approximately ten feet below the water table. Additional monitoring well details are presented in Appendix B. Rizzo Associates anticipates four days will be required for the installation of the monitoring wells.
- 3. Evaluation of PCB-Contaminated Soils. A soil boring program will be initiated to evaluate the nature and extent of PCB-contaminated soils in the vicinity of the intersection of the stormwater drain and the raceway. Three borings will be installed in the locations identified on the Site Plan. The borings will be advanced using a hollow stem auger and continuous split spoon samples will be collected and screened for the presence of PCBs in the field. The borings will be advanced to a depth of ten feet or natural overburden material, the water table, or refusal, whichever is less. The borings will be installed at an approximate 20-foot radius from the existing manhole. A maximum of three soil samples (one from each boring) will be collected and submitted for laboratory analysis for PCBs.

If field screening of soil samples results in the positive identification of elevated levels of PCBs, additional borings will be installed at an increasing radius from the identified area utilizing similar procedures. One day is estimated to install the three borings and perform the soil screening procedure.

In addition, a composite sample will be collected from the upper 12 inches of the tail race sediments and laboratory analyzed for PCBs.

- 4. Potentiometric Surface Evaluation. The elevation of all newly installed monitoring wells and existing monitoring well B1-OW will be surveyed relative to mean sea level (MSL) and located on the existing Site Plan. In addition, the surface elevation of the raceway pond, the raceway outfall and the East Branch at Neponset Street, and in the vicinity of the outfall will be determined. The groundwater elevation in each monitoring well will be determined and a potentiometric surface map for the Site will be prepared.
- 5. Groundwater Sampling and Analyses. All newly installed and existing monitoring well Bl-OW will be sampled in accordance with standard procedures outlined in Appendix A. Analysis are identified in Table 1. One duplicate sample will be collected from RIZ-3, RIZ-4, RIZ-5 or RIZ-7 and analyzed for VOCs, TPH and PP metals. A second duplicate sample will be collected from the remaining wells and analyzed for VOCs only. A trip blank will accompany samples and will be analyzed for VOCs for quality control purposes.
- Analytical results from all monitoring wells will be reviewed prior to initiating hydraulic conductivity testing. If analytical results indicate the presence of constituents in excess of available water quality standards, insitu hydraulic conductivity tests will be conducted on a maximum of four newly installed monitoring wells. The tests will be conducted in accordance with procedures outlined in Bouwer and Rice (1976). This reference is presented in Appendix C for your information.

Table 1 GROUNDWATER SAMPLE ANALYSIS CONSTITUENTS

Well Number	Constituents
RIZ-1	vocsl
RIZ-2	VOCs, TPH ²
RIZ-3	VOCs, TPH, PP Metals ³
RIZ-4	VOCs, TPH, PP metals
RIZ-5	VOCs, TPH, PP Metals
RIZ-6	VOCs
RI2-7	VOCs, TPH, PP Metals
RIZ-8	VOCs
B1-OW	VOCs

### Notes:

- Volatile Organic Compound Analysis (Hazardous Substance List) by EPA Method 624

  2. Total Petroleum Hydrocarbon Analysis by EPA Method 418.1

  3. Soluble 13 Priority Pollutant Metals

- 7. Report Preparation. A Phase I Site Assessment Report will be prepared in accordance with DEQE guidelines. The report will include the following sections:
  - 1.0 Abstract
  - 2.0 Introduction
  - 3.0 Purpose and Scope
  - 4.0 Site Description
  - 5.0 History and Uses of Adjacent Properties
  - 6.0 Subsurface Investigations
  - 7.0 Analysis of Laboratory Results
  - 8.0 Summary and Conclusion

#### Schedule

Rizzo Associates estimates approximately 10 weeks will be required subsequent to the execution of a contract to complete the investigation as described in the technical scope of services and provide W.R. Grace with a Draft Phase I Site Investigation Report. This schedule is subject to drilling subcontractor availability and an estimated two-week availability of sample results from a Massachusetts Certified Laboratory subsequent to the date of submission.

Rizzo Associates has been pleased to provide W.R. Grace with this preliminary technical scope of services. We are confident that it represents a complete and cost-effective approach to assessing the potential environmental concerns of DEQE at your Canton, Massachusetts facility.

If you have any questions regarding the content of this submittal, please do not hesitate to contact us.

John E. Adams

Project Manager

Very truly yours

Richard J. Hughto, Ph.D., P.E.

Vice President

JEA/dac/2379H

APPENDIX A

## STANDARD OPERATING PROTOCOL FOR CLEANING SAMPLING EQUIPMENT

- 1. Cleaning of the sampling equipment is performed immediately prior to sample collection.
- Any portion of the sampling device or equipment that has contact with water or soil is cleaned, or disposed of and replaced, prior to re-use.
- 3. The following four-step procedure is followed for cleaning all sampling devices and related equipment:
  - a. The item is washed with soap and water;
  - b. The item is rinsed thoroughly with clean water;
  - c. The item is rinsed with reagent methanol; and
  - d. The item is given a final rinse with distilled water.
- 4. Steam cleaning may be substituted for Steps 3a and 3b when available.

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STANDARD OPERATING PROTOCOL FOR FIELD SCREENING SAMPLES USING A PORTABLE GAS CHROMATOGRAPH

Samples are field screened for volatile organic compounds (VOCs) using a Photovac Model 10Sl0 portable gas chromatograph equipped with a 4-foot by 1/8-inch SE-30 column.

#### 1. Soil Samples

Soil samples are collected in 40-milliliter (ml) volatile organic analysis (VOA) vials with septum style tops. Approximately 10 grams of sample are placed in a tared VOA vial containing 20 mls of organic-free water. The vial is then capped, weighed and shaken for one minute. The vial is allowed to reach ambient temperature (251 C). An aliquot of the headspace gas is then collected in an air-tight syringe and injected into the portable gas chromatograph.

#### 2. Water Samples

Water samples are collected in 40-milliliter (ml) volatile organic analysis (VOA) vials completely filled and containing no air bubbles. Using a clean 10-ml syringe, 10 ml of water is removed from the vial. The vial is then shaken for one minute and allowed to reach ambient temperature (25° C). An aliquot of the headspace gas is then collected in an air-tight syringe and injected into the portable gas chromatograph.

#### 3. Data Interpretation

Chromatographic analysis of a sample is performed for the purpose of identifying and quantifying the individual components that make up a complex sample mixture. The chromatogram, which is a plot of the detector output versus time, will ideally consist of a series of separate peaks. The time it takes for a VOC to pass through the chromatographic column, known as the retention time, is used to identify the VOC. The area under each peak is proportional to the VOC's concentration.

Identification of the peaks in the chromatogram is made by comparison of the retention times of the sample peaks to the retention times of known standards analyzed under the same conditions. The standards are reinjected periodically through the course of the analysis to check the instrument response and to check for possible changes in standard retention times.

PORTABLE GAS CHROMATOGRAPH PROTOCOL (continued)

Sample peaks with retention times that match a standard are given a tentative identification. Identifications are not positive because the retention times of different VOCs may match under certain conditions. Confirmation of the tentative field identifications can be obtained through laboratory analysis. If the retention time of a sample peak does not match the available field standards, the peak is listed as unidentified. An unidentified peak is a VOC compound with an identity different than any of the available field standards utilized. Unidentified peaks can also be identified through laboratory analysis.

Identified peaks are quantified by comparing the sample peak area to the standard peak area. The calculated concentrations are approximate and represent relative concentrations for field screening purposes. For comparative purposes, unidentified peaks are quantified relative to benzene.

The major factors contributing to the uncertainty of the field data are the possible presence of unidentified VOCs that have not been separated from the identified VOCs and the variable responses of different VOCs to the portable gas chromatograph. The presence of an unidentified VOC that has not been separated from an identified VOC will result in an erroneously high calculation of the concentration. Variable responses of different compounds, such as non-linear response curves, also contribute to the uncertainty of the field data. A response curve for each standard has been constructed using a one-point calibration and assuming a linear response. A compound that displays a linear response will have a straight line plot of the peak area versus concentration; consequently, the proportionality of the concentration to the peak area will be constant. Variations in the response curve for each compound will contribute to the uncertainty of the data. This uncertainty is particularly high when the concentration of the sample differs greatly from the concentration of the standard. Confirmation of the field data can be obtained by laboratory analysis.

Field blanks and duplicates are periodically analyzed for quality control purposes. All standards are freshly prepared and periodically reinjected to check for instrument response.

## GUIDELINES FOR SOIL SAMPLING WITH A SPADE AND SCOOP

#### Discussion

The simplest, most direct method of collecting soil samples for subsequent laboratory analysis is with the use of a spade and scoop. A normal lawn or garden spade is utilized to remove the top cover of soil to the required depth and then a smaller stainless steel scoop is used to collect the sample.

#### Uses

This method can be used in most soil types but is limited somewhat to sampling the near surface. Samples from depths greater than 50 cm become extremely labor intensive in most soil types. Very accurate, representative samples can be collected with this procedure depending on the care and precision demonstrated by the technician. The use of a flat, pointed mason trowel to cut a block of the desired soil will be of aid when undisturbed profiles are required. A stainless steel scoop or lab spoon will suffice in most other applications. Care should be exercised to avoid the use of devices plated with chrome or other materials. Plating is particularly common with garden implements such as potting trowels.

#### Procedures for Use

- Prior to initiating any work, the Health and Safety Plan developed for the specific site activities should be reviewed by the Field Technician and the Project Manager. The indicated measures of the Plan should be enacted prior to initiation of the sampling activities. Any concerns not addressed in the Health and Safety Plan document are to be brought immediately to the attention of the Health and Safety Officer.
- Carefully remove the top layer of soil to the desired sample depth with a precleaned spade.
- 3. Using a precleaned stainless steel scoop or trowel, remove and discard a thin layer of soil from the area which comes in contact with the shovel.
- 4. Transfer sample into an appropriate sample bottle with a stainless steel lab spoon or equivalent.

SOIL SAMPLING WITH A SPADE PROTOCOL (continued)

- 5. Check that a Teflon liner is present in the cap, if required. Secure the cap tightly. The chemical preservation of solids is generally not recommended. Refrigeration is usually the best approach, supplemented by a minimal holding time. For specific containerization and preservation requirements consult the laboratory prior to sample collection.
- 6. Label the sample bottle with the appropriate sample tag. Be sure to label the tag carefully and clearly, addressing all the categories or parameters. Complete all chain-of-custody documents and record in the field log book.
- 7. Decontaminate equipment after use and between sample locations.

#### Adapted from:

Characterization of Hazardous Waste Sites - A Methods Manual: Volume II Available Sampling Methods, Second Edition, EPA-600/14-84-076, December 1984.

1058H/p.6

STANDARD OPERATING PROTOCOL FOR COMPLETING SOIL BORINGS AND MONITORING WELL BORINGS IN UNCONSOLIDATED SURFICIAL DEPOSITS.

- 1. All drilling is inspected continuously by a staff Geologist or Inspector. The Geologist or Inspector is familiar with the particular drilling program and is responsible for ensuring that established procedures are followed. The Geologist or Inspector has the authority to modify the program and/or procedures when warranted by unanticipated field conditions.
- 2. The Geologist or Inspector is responsible for maintaining field notes and for keeping a well log independent of the driller.
- all drilling equipment is steam cleaned prior to use at each boring or well location. Steam cleaning is performed on the augers and/or casing, drilling rods, samplers, auger forks, lifting hooks and other equipment needed for establishing the well. The working end of the drill rig is steam cleaned, and the rig is generally inspected by the Geologist or Inspector for evidence of leaks (i.e., gasoline or diesel fuel and hydraulic fluid). Finally, well construction materials including casing, screens, protective risers and/or roadway boxes are also steam cleaned prior to use.
- 4. Soil samples are collected at two-foot intervals unless otherwise specified, and/or at changes in strata, utilizing a clean split-spoon sampler. These soil samples are used for characterizing the physical nature of the subsurface sediments and may be collected for laboratory analyses. Similarly, spoon samples may be screened in the field for contamination utilizing appropriate field analytical devices. All such sample collection or field screening is conducted per appropriate standard operating protocols.
- 5. Sediments collected from the sampler or brought to the surface by the drilling process are left on-site, unless there are specific instructions to the contrary. Following completion of a boring into which no well is to be established, this material is utilized to back-fill the boring. The back-filled boring is compacted. Should compaction result in a depression, clean fill will be used to bring the land to grade. The material from the boring is not utilized for back-fill if a groundwater quality monitoring well is to be established in the boring.

# SOIL AND MONITORING WELL BORINGS (continued)

- 6. When installing a groundwater monitoring well in unconsolidated sedimentary deposits, the well boring is advanced a minimum of ten feet into the water table, or to refusal, unless otherwise specified. If groundwater is encountered at or near refusal, the hole may be advanced several feet into the rock utilizing a roller bit or diamond corer. By doing so, the well screen can be set to intercept groundwater flow at the refusal/overburden interface.
- 7. When installing a groundwater monitoring well, the well screen is set at a depth whereby it intercepts the surface of the water table, unless otherwise specified. The screen is set to extend above the highest anticipated groundwater levels, to a maximum of within three feet of the land surface. The annular space between the wall of the bore hole and the screen is then packed with clean silica sand to a level two feet above the screen (to allow for settling). A minimum one-foot bentonite seal is followed by clean backfill grout to within three feet of the surface. The final three feet are filled with a cement grout into which is set a protective riser with locking cap or a roadway box.

1058H/p.9

#### GUIDELINES FOR SAMPLING BOTTOM SLUDGES OR SEDIMENTS WITH AN EKMAN DREDGE

#### Discussion

The Ekman Dredge is a clamshell-type scoop activated by a spring-loaded system. The shell is opened and latched in place and slowly lowered on a nylon cord. With the device resting on the substrate to be sampled, a messenger weight is released to slide down the lowering cord. When the messenger hits the top of the dredge, it activates the spring mechanism which quickly closes the clamshell, thereby collecting the sample.

#### <u>Uses</u>

Ekman Dredges are capable of sampling most types of sludges and sediments from silts to granular materials. They are available in several sizes. Penetration depths will usually not exceed several centimeters. Grab samplers, unlike corers, are not capable of collecting undisturbed samples. As a result, materials in the first centimeter of sludge cannot be separated from that at lower depths. The sampling action of these devices causes agitation currents which may temporarily resuspend some settled solids. This disturbance can be minimized by slowly lowering the sampler the last one-half meter and allowing a very slow contact with the bottom. Similar care should be taken when raising the dredge. Water will flow through the device as it is raised, and finer-grained sample material will be lost and suspended in the surrounding water. Hence, it is advisable to only collect sludge or sediment samples after all overlying water samples have been obtained.

#### Procedures for Use

- Prior to initiating any work, the Health and Safety Plan developed for the specific site activities should be reviewed by the Field Technician and the Project Manager. The indicated measures of the Plan should be enacted prior to initiation of the sampling activities. Any concern not addressed in the Health and Safety Plan document are to be brought immediately to the attention of the Health and Safety Officer.
- 2. Attach a precleaned Ekman Dredge to the necessary length of sample line. Solid braided 5-mm (3/16-inch) nylon line is usually of sufficient strength; however, 20-mm (3/4-inch) or greater nylon line allows for easier hand hoisting.

## BOTTOM SLUDGE SAMPLING PROTOCOL (continued)

- 3. Measure and mark the distance to bottom of the sample line. A secondary mark, I meter shallower, will indicate proximity so that lowering rate can be reduced, thus preventing unnecessary bottom disturbance.
- 4. Open sampler jaws until latched. From this point on, keep everything clear of the jaws. The spring can be easily released, and the jaw closure is very powerful.
- 5. Tie-free end of sample line to fixed support to prevent accidental loss of sampler. A second safety line is recommended.
- 6. Begin lowering the sampler while making sure the messenger is not prematurely released.
- 7. Proceed at a slow rate of descent through the last meter until contact with the bottom is felt.
- 8. While holding the line as vertical as possible, release the messenger and observe that the spring has been released.
- 9. Slowly raise dredge clear of water surface.
- 10. Place the dredge into a stainless steel or Teflon tray and open. Lift it clear of the tray.
- 11. Collect a suitable aliquot with a stainless steel lab spoon, or equivalent, and place sample into appropriate sample bottle.
- 12. Check for a Teflon liner in cap, if required, and secure cap tightly. The chemical preservation of solids is generally not recommended. Refrigeration is usually the best approach, supplemented by a minimal holding time.
- 13. Label the sample bottle with the appropriate sample tag. Be sure to label the tag carefully and clearly, addressing all the categories or parameters. Complete all chain-of-custody documents and record in the field logbook.
- 14. Decontaminate equipment after use and between sample locations.

#### Adapted from:

Characterization of Hazardous Waste Sites - A Methods Manual: Volume II, Available Sampling Methods, Second Edition, EPA-600/4-84-076, December 1984.

## GUIDELINES FOR SAMPLING MONITORING WELLS WITH A BUCKET-TYPE BAILER

#### Discussion

Bucket-type bailers are tall, narrow buckets equipped with a check valve on the bottom. This valve allows water to enter from the bottom as the bailer is lowered, then prevents the water's release as the bailer is raised. Top filling bailers are also available and may be useful for well purging, but generally result in increased sample turbulence and are not recommended for sample acquisition.

#### <u>Uses</u>

This device is particularly useful when samples must be recovered from depths greater than the range (or capability) of suction lift pumps, when volatile stripping is of concern, or when well casing diameters are too narrow to accept submersible pumps. It is the method of choice for the collection of samples which are susceptible to volatile component stripping or degradation due to the aeration associated with most other recovery systems. Samples can be recovered with a minimum of aeration if care is taken to gradually lower the bailer until it contacts the water surface and is then allowed to sink as it fills. Teflon is generally the best construction material, but other materials (PVC, stainless steel, etc.) are acceptable if compatible with designated sample analysis. The primary disadvantages of bailers are their limited sample volume and inability to collect discrete samples from a depth below the water surface.

### Procedures for Use

- Prior to initiating any work, the Health and Safety Plan developed for the specific site activities should be reviewed by the Field Technician and the Project Manager. The indicated measures of the Plan should be enacted prior to initiation of the sampling activities. Any concerns not addressed in the Health and Safety Plan document are to be brought immediately to the attention of the Health and Safety Officer.
- 2. Using clean, non-contaminating equipment [i.e., an electronic level indicator (avoid indicating paste)], determine and record in the field logbook the water level in the well, then calculate the fluid volume in casing.

# MONITORING WELL SAMPLING PROTOCOL (continued)

- 3. Attach precleamed bailer to cable or line for lowering into the well.
- 4. Lower bailer slowly until it contacts water surface.
- 5. Allow bailer to sink and fill with a minimum of surface disturbance.
- 6. Slowly raise bailer to surface. Do not allow bailer line to contact ground.
- 7. Repeat Steps 3, 4 and 5 above until a minimum of three casing volumes have been removed from the well.
- 8. After a minimum of three casing volumes have been removed, allow the water level to return to a sufficient level to collect a complete sample and proceed with the sample collection as described below. Repeat Steps 3, 4 and 5 as needed to acquire sufficient sample volume.
- 9. When transferring the sample in the bailer to the sample container, tip the bailer to allow a slow discharge from the bailer top to flow gently down the side of the sample bottle with minimum entry turbulence.
- 10. Select sample bottles and preserve the sample, if necessary, according to the guidelines obtained from the laboratory.
- 11. Check that a Teflon liner is present in the cap if required. Secure the cap tightly.
- 12. Label the sample bottle with an appropriate tag. Be sure to complete the tag with all necessary information. Record the information in the field logbook and complete all chain-of-custody documents.
- 13. Thoroughly decontaminate the bailer after each use according to specific laboratory instructions or the general decontamination guidelines, and discard the bailer cable or line. In some cases, especially where trace analysis is desired, it may be prudent to use a separate bailer for each well.

#### Adapted From:

Characterization of Hazardous Waste Sites - A Methods Manual: Volume II, Available Sampling Methods, Second Edition EPA-600/14-84-076, December 1984.

## PROTOCOL FOR SOIL SAMPLING USING AN AUGER

### Discussion

This system consists of an auger bit, a series of extension rods and a 'T' handle. The auger is used to bore a hole to the desired depth. Soil samples can be recovered directly from the auger flights or from the 'bucket' when a bucket auger is used. When sampling from the flights, it should be understood that this technique does not provide an undisturbed sample, and actual depth from which the sample is collected is usually not known. The length of the bucket is approximately 16 inches, so penetration and sampling can be done at a maximum of 16_inch increments when using the bucket auger. Consequently, discrete samples can be collected with fairly reasonable accuracy.

#### <u>Uses</u>

The system can be used in a wide variety of soil conditions. It can be used to sample both from the surface and from below the ground. The presence of rock layers, large cobbles or collapse of the bore hole, however, usually prohibits sampling at depths in excess of two meters.

#### Procedures for Use

- 1. Make sure all equipment is cleaned according to proper cleaning procedures.
- 2. Prepare the auger using the necessary bits and extensions. When using the bucket auger, attach the bucket auger to one end of the extension rod and the 'T' handle to the other end.
- 3. Clear the area to be sampled of any surface debris. It may be advisable to remove the first 8 to 15 cm of surface soil for an area approximately 15 cm in radius around the drilling location.
- 4. Begin drilling by rotating the handle clockwise while applying a downward pressure. When the desired depth is reached, carefully remove the auger from the boring so as not to scrape the bore hole sides. When using a bucket auger, remove the auger from the hole at increments of approximately 16 inches or less and clean out the soil in the bucket. Attach extension rods as needed to reach the desired depth.

# SOIL SAMPLING WITH AN AUGER (continued)

- 5. After reaching the desired depth for sampling, gradually force the auger into the soil to be sampled. Care should be taken to avoid scraping the bore hole sides.
- 6. When the desired depth of sampling has been reached, carefully remove the auger so as not to scrape the bore hole sides or to accumulate soil during retrieval of the sample.
- 7. Carefully remove the sample from the auger and place it in a properly labeled sample container.
- 8. Properly clean all equipment after use.

### Adapted from:

deVera, E. R., Simmons, B.P., Stephens, R. D., and Storm, D. L., "Samplers and Sampling Procedures for Hazardous Waste Streams," EPA 600/2-80-018, January 1980.

1058H/p.16

#### JAR HEADSPACE ANALYTICAL SCREENING PROCEDURE

The following procedures will be utilized when conducting analytical screening of gasoline contaminated soils utilizing a portable Photoionization Detector (PID) or Flame Ionization Detector (FID):

- Half-fill two clean glass 16 oz. jars with the sample to be analyzed. Quickly cover each open top with one or two sheets of clean aluminum foil and subsequently apply screw caps to tightly seal the jars.
- 2. Allow headspace development for at least 10 minutes.

  Vigorously shake jars for 10 seconds both at the beginning and end of the headspace development period. Where ambient temperatures are below 32°F (O C) headspace development will be done within a heated vehicle or building.
- 3. Subsequent to headspace development, remove screw lid/expose foil seal foil seal. Quickly puncture foil seal with instrument sampling probe, to a point about one-half of the headspace depth. Exercise care to avoid uptake of water droplets or soil particulates.
- 4. Following probe insertion through foil seal and/or sample injection to probe, record highest meter response as the jar headspace concentration. Using foil seal/probe insertion method, maximum response should occur between two and five seconds. Erratic meter response may occur at high organic vapor concentration or conditions of elevated headspace moisture, in which case headspace data will be discounted.
- 5. The headspace screening data from both jar samples will be recorded and compared; generally, replicate values should be consistent to plus or minus 20 percent.
- 6. PID and FID field instruments will be operated and calibrated to yield "total organic vapors" in ppm (v/v) as benzene. PID instruments will be operated with a 11.7 eV (+/-) lamp source. Operation, maintenance and calibration will be performed in accordance with the manufacturer's specifications. For jar headspace analysis, instrument calibration will be checked/adjusted no less than once every 10 analyses, or daily, whichever is greater.

2379H/

APPENDIX B

## GROUNDWATER MONITORING WELL DETAILS

SITE:

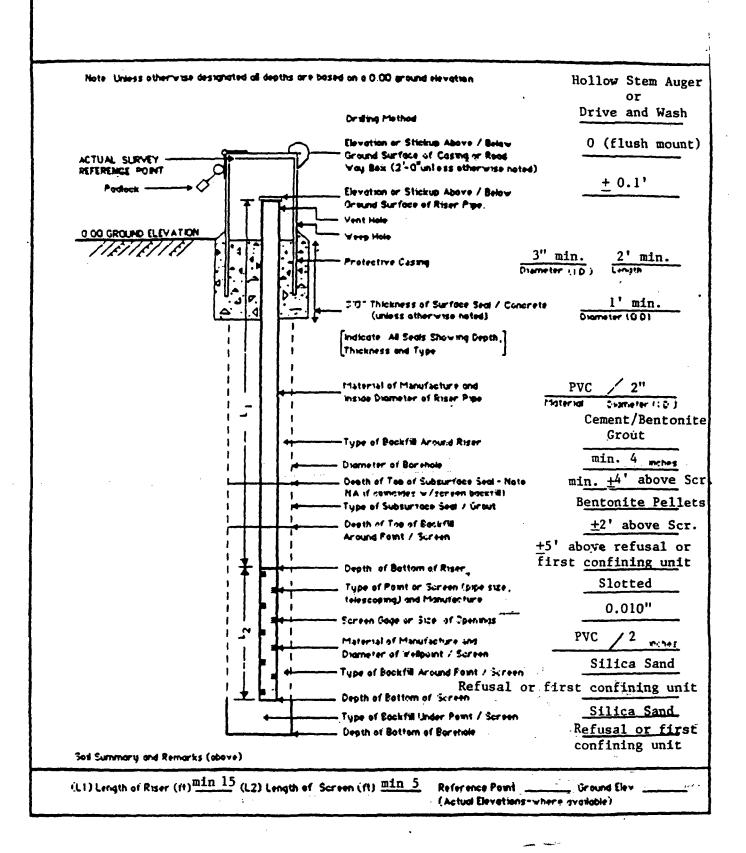
W.R. Grace

LOCATION: Canton, Massachusetts

837-01

PROJECT NO.

SPECIAL NOTES: Deep Overburden Monitoring Well



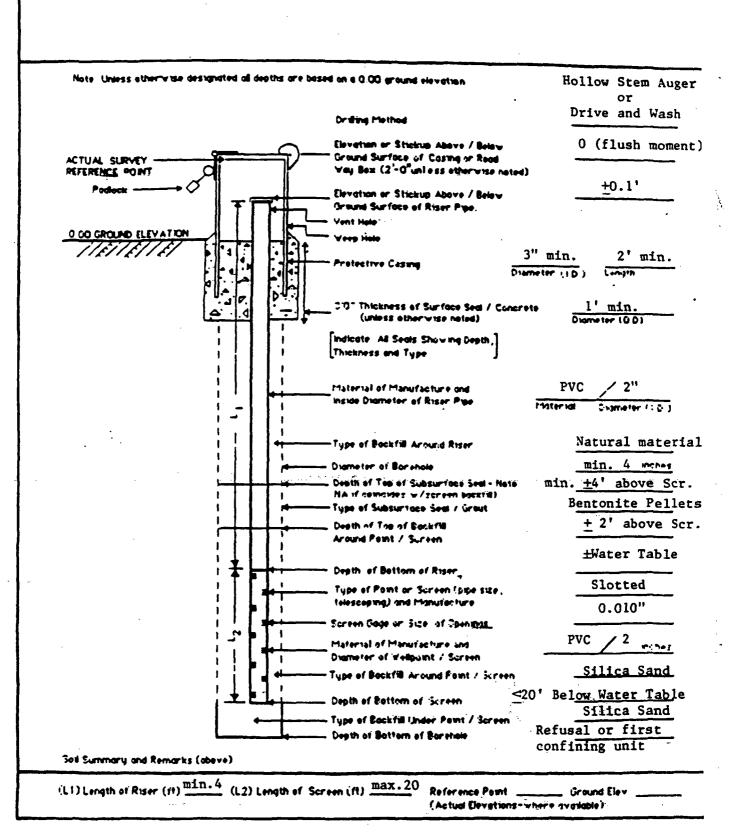
## GROUNDWATER MONITORING WELL DETAILS

SITE: W.R. Grace LOCATION: Canton, Massachusetts

837-01

PROJECT NO.

SPECIAL NOTES: Shallow Overburden Monitoring Well



APPENDIX C

# A Slug Test for Determining Hydraulic Conductivity of Unconfined Aquifers With Completely or Partially Penetrating Wells

### HERMAN BOUWER AND R. C. RICE

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A procedure is presented for calculating the hydraulic conductivity of an aquifer near a well from the rate of rise of the water level in the well after a certain volume of water is suddenly removed. The calculation is based on the Thiem equation of steady state flow to a well. The effective radius  $R_{\sigma}$  over which the head difference between the equilibrium water table in the aquifer and the water level in the well is dissipated was evaluated with a resistance network analog for a wide range of system geometries. An empirical equation relating  $R_{\sigma}$  to the geometry of the well and aquifer was derived. The technique is applicable to completely or partially penetrating wells in unconfined aquifers. It can also be used for confined aquifers that receive water from the upper confining layer. The method's results are compatible with those obtained by other techniques for overlapping geometries.

With the slug test the hydraulic conductivity or transmissibility of an aquifer is determined from the rate of rise of the water level in a well after a certain volume or 'slug' of water is suddenly removed from the well. The slug test is simpler and quicker than the Theis pumping test because observation wells and pumping the well are not needed. With the slug test the portion of the aquifer 'sampled' for hydraulic conductivity is smaller than that for the pumping test even though with the latter, most of the head loss also occurs within a relatively small distance of the pumped well and the resulting transmissibility primarily reflects the aquifer conditions near the pumped well.

Essentially instantaneous lowering of the water level in a well can be achieved by quickly removing water with a bailer or by partially or completely submerging an object in the water, letting the water level reach equilibrium, and then quickly removing the object. If the aquifer is very permeable, the water level in the well may rise very rapidly. Such rapid rises can be measured with sensitive pressure transducers and fast-response strip chart recorders or x-y plotters. Also it may be possible to isolate portions of the perforated or screened section of the well with special packers for the slug test. This not only reduces the inflow and hence the rate of rise of the water level in the well, but it also makes it possible to determine the vertical distribution of the hydraulic conductivity. Special packer techniques may have to be developed to obtain a good seal, especially for rough casings or perforations. Effective sealing may be achieved with relatively long sections of inflatable stoppers or tubing. The use of long sections of these materials would also reduce leakage flow from the rest of the well to the isolated section between packers. This flow can occur through gravel envelopes or other permeable zones surrounding the casing. Sections of inflatable tubing may have to be long enough to block off the entire part of the well not used for the slug test. High inflation pressures should be used to minimize volume changes in the tubing due to changing water pressures in the isolated section when the head is lowered.

So far, solutions for the slug test have been developed only for completely penetrating wells in confined aquifers. Cooper et al. [1967] derived an equation for the rise or fall of the water level in a well after sudden lowering or raising, respectively. Their equation was based on nonsteady flow to a pumped,

completely penetrating well, and the solution was expressed as a series of 'type curves' against which observed rates of water level rises were matched. Values for the transmissibility and storage coefficient were then evaluated from the curve parameter and horizontal-scale position of the type curve showing the best fit with the experimental data. Skibitzke [1958] developed an equation for calculating transmissibility from the recovery of the water level in a well that was repeatedly bailed. The technique is limited to wells in confined aquifers with sufficiently shallow water levels to permit short time intervals between bailing cycles [Lohman, 1972].

To use the slug test for partially penetrating or partially perforated wells in confined or unconfined aquifers, some solutions developed for the auger hole and piezometer techniques to measure soil hydraulic conductivity [Bouwer and Jackson. 1974] may be employed. However, the geometry of most groundwater wells is outside the range in geometry covered by the existing equations or tables for the auger hole or piezometer methods. For this reason, theory and equations are presented in this paper for slug tests on partially or completely penetrating wells in unconfined aquifers for a wide range of geometry conditions. The wells may be partially or completely perforated, screened, or otherwise open along their periphery. While the solutions are developed for unconfined aquifers. they may also be used for slug tests on wells in confined aquifers if water enters the aquifer from the upper confining layer through compression or leakage.

### THEORY

Geometry and symbols of a well in an unconfined aquifer are shown in Figure 1. For the slug test the water level in the well is suddenly lowered, and the rate of rise of the water level is measured. The flow into the well at a particular value of y can be calculated by modifying the Thiem equation to

$$Q = 2\pi K L \frac{y}{\ln (R_s/r_y)} \tag{1}$$

where Q is the flow into the well (length²/time), K is the hydraulic conductivity of the aquifer (length/time), L is the height of the portion of well through which water enters (height of screen or perforated zone or of uncased portion of well), y is the vertical distance between water level in well and equilibrium water table in aquifer,  $R_o$  is the effective radius over which y is dissipated, and  $r_m$  is the horizontal distance

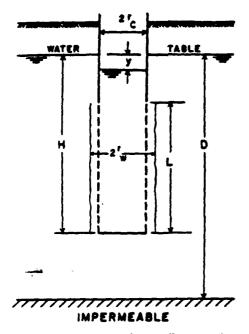


Fig. 1. Geometry and symbols of a partially penetrating, partially perforated well in unconfined aquifer with gravel pack or developed zone around perforated section.

from well center to original aquifer (well radius or radius of casing plus thickness of gravel envelope or developed zone).

The terms L, y,  $R_{\bullet}$ , and  $r_{\omega}$  are all expressed in units of length. The effective radius  $R_{\bullet}$  is the equivalent radial distance over which the head loss y is dissipated in the flow system. The value of  $R_{\bullet}$  depends on the geometry of the flow system, and it was determined for different values of H, L, D, and  $r_{\omega}$  (Figure 1) with a resistance network analog, as will be discussed in the next section. Equation (1) is based on the assumptions that (1) drawdown of the water table around the well is negligible, (2) flow above the water table (in the capillary fringe) can be ignored, (3) head losses as water enters the well (well losses) are negligible, and (4) the aquifer is homogeneous and isotropic. These are the usual assumptions in the development of equations for pumped hole techniques [Bouwer and Jackson, 1974, and references therein].

The value of  $r_w$  in (1) represents the radial distance between the undisturbed aquifer and the well center. Thus  $r_w$  should include gravel envelopes or 'developed' zones if they are much more permeable than the aquifer itself (Figure 1).

The rate of rise, dy/dt, of the water level in the well after suddenly removing a slug of water can be related to the inflow Q by the equation

$$dy/dt = -Q/\pi r_c^2 \tag{2}$$

where  $\pi r_e^2$  is the cross-sectional area of the well where the water level is rising. The minus sign in (2) is introduced because y decreases as t increases.

The term  $r_c$  is the inside radius of the casing if the water level is above the perforated or otherwise open portion of the well. If the water level is rising in the perforated section of the well, allowance should be made for the porosity outside the well casing if the hydraulic conductivity of the gravel envelope or developed zone is much higher than that of the aquifer. In that case the (open) porosity in the permeable zone must be included in the cross-sectional area of the well. For example, if the radius of the perforated casing is 20 cm and the casing is

surrounded by a 10-cm permeable gravel envelope with a porosity of 30%,  $r_e$  should be taken as  $[20^e + 0.30(30^e - 20^e)]^{0.6} \approx 23.5$  cm to obtain the cross-sectional area of the well that relates Q to dy/dt. The value of  $r_m$  for this well section is 30 cm.

Combining (1) and (2) yields

$$\frac{1}{y} \, dy = -\frac{2KL}{r_c^2 \ln \left( R_t / r_n \right)} \, dt \tag{3}$$

which can be integrated to

$$\ln y = -\frac{2KLt}{r_c^2 \ln (R_c/r_m)} + \text{constant}$$
 (4)

Applying this equation between limits  $y_0$  at t = 0 and  $y_t$  at t and solving for K yield

$$K = \frac{r_e^2 \ln (R_e/r_w)}{2L_f} \frac{1}{t} \ln \frac{y_0}{y_1}$$
 (5)

This equation enables K to be calculated from the rise of the water level in the well after suddenly removing a slug of water from the well. Since K,  $r_e$ ,  $r_w$ ,  $R_e$ , and L in (5) are constants. (1/t) in  $y_o/y_t$  must also be constant. Thus field data should yield a straight line when they are plotted as  $\ln y_t$  versus t. The term (1/t)  $\ln y_o/y_t$  in (5) is then obtained from the best-fitting straight line in a plot of  $\ln y$  versus t (see the example). The value of  $\ln R_e/r_w$  is dependent on H, D, L, and  $r_w$  and can be evaluated from the analog results presented in the next section. The transmissibility T of the aquifer is calculated by multiplying (5) by the thickness D of the aquifer or

$$T = \frac{Dr_o^2 \ln (R_o/r_w)}{2L} \frac{1}{t} \ln \frac{y_o}{y_i}$$
 (6)

This equation is based on the assumption that the aquifer is uniform with depth.

Equations (5) and (6) are dimensionally correct. Thus K and T are expressed in the same units as the length and time parameters in the equations.

### EVALUATION OF R.

Values of  $R_e$ , expressed as  $\ln R_e/r_m$ , were determined with an electrical resistance network analog for different values of  $r_m$ , L, H, and D (Figure 1), using the same assumptions as those for (1). An axisymmetric sector of 1 rad was simulated by a network of electrical resistors. The vertical distance between the nodes was constant, but the radial distance between nodes increased with increasing distance from the center line (Figure 2). This yielded a network with the highest node density near the well, where the head loss was greatest, and a decreasing node density toward the outer reaches of the system. For a more detailed discussion of graded networks for representing axisymmetric flow systems, see Liebmann [1950] and Bouwer [1960].

The radial extent of the medium represented on the analog was more than 60,000 times the largest  $r_w$  value used in the analyses. Thus the radial extent of the analog system was essentially infinite, as evidenced by the fact that a reduction in radial extent by several nodes did not have a measurable effect on the observed value of  $R_e$ .

The value of  $R_o$  for an infinitely deep aquifer  $(D = \infty)$  was determined by simulating an impermeable and then an infinitely permeable layer at a certain value of D. If this value of D is taken to be sufficiently large, the flow in the system when, the layer at D is taken as being impermeable is only slightly

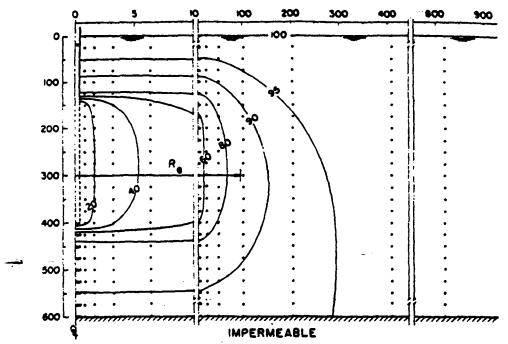


Fig. 2. Node arrangement (dots) for resistance network analog and potential distribution (indicated as percentages on equipotentials) for system with  $L/r_w = 625$ ,  $H/r_w = 1000$ , and  $D/r_w = 1500$ . The numbers on the left and at the top of the figure are arbitrary length units (note breaks in horizontal scale).

less than the flow when the layer is taken as being infinitely permeable. The average of the two flows can then be taken as a good estimate of the flow that would occur if the aquifer were represented on the analog as being uniform to infinite depth [Bouwer, 1967]. This average flow was used to calculate  $R_{\sigma}$  for  $D = \infty$ .

The analog analyses were performed by simulating a system with certain values of  $r_w$ , H, and D. The electrical current entering the 'well' was then measured for different values of L, ranging from near H to near 0. This was repeated for other values of  $r_w$ , H, and D. The condition where L = H could not be simulated on the analog because it would mean a short between the water table as the source and the well as the sink. The electrical current flow in the analog was converted to volume per day, and  $\ln R_e/r_w$  was evaluated with (1) for each combination of  $r_w$ , H, L, and D used in the analog.

For a given geometry described by  $r_w$ , H, and D, the current flow  $Q_t$  into the simulated well varied essentially linearly with L and could be described by the equation

$$Q_1 = mL + n \tag{7}$$

Because of the linearity between  $Q_i$  and L the results of the analyses could be extrapolated to the condition L = H. The values of m in (7) appeared to vary inversely with  $\ln H/r_m$ . The values of n varied approximately linearly with  $\ln ((D - H)/r_m)$ , the slope A and intercept B in these relations being a function of  $L/r_m$ . This enabled the derivation of the following empirical equation relating  $\ln R_0/r_m$  to the geometry of the system:

$$\ln \frac{R_e}{r_o} = \left[ \frac{1.1}{\ln (H/r_o)} + \frac{A + B \ln ((D - H)/r_o)}{L/r_o} \right]^{-1}$$
 (8)

In this equation, A and B are dimensionless coefficients that are functions of  $L/r_w$ , as shown in Figure 3. If D >> H, an increase in D has no measurable effect on  $\ln R_w/r_w$ . The analog

results indicated that the effective upper limit of  $\ln |(D-H)/r_w|$  is 6. Thus if D is considered infinity or  $(D-H)/r_w$  is so large that  $\ln |(D-H)/r_w|$  is greater than 6, a value of 6 should still be used for the term  $\ln |(D-H)/r_w|$  in (8).

If D = H, the term  $\ln \left[ (D - H)/r_0 \right]$  in (8) cannot be used. The analog results indicated that for this condition, which is the case of a fully penetrating well, (8) should be modified to

$$\ln R_{\circ}/r_{\sigma} = \left(\frac{1.1}{\ln (H/r_{\odot})} + \frac{C}{L/r_{\odot}}\right)^{-1}$$
 (9)

where C is a dimensionless parameter that is a function of  $L/r_m$  as shown in Figure 3.

Equations (8) and (9) yield values of  $\ln R_c/r_w$  that are within 10% of the actual value as evaluated by analog if L > 0.4H and within 25% if  $L \ll H$  (for example, L = 0.1H).

The analog analyses were performed for wells that were closed at the bottom. Occasionally, however, wells with open bottoms were also simulated. The flow through the bottom appeared to be negligible for all values of  $r_o$  and L used in the analyses. If L is not much greater than  $r_o$  (for example,  $L/r_o$  << 4), the system geometry approaches that of a piezometer cavity [Bouwer and Jackson, 1974], in which case the bottom flow can be significant. Equations (8) and (9) can also be used to evaluate  $\ln R_o/r_o$  if a portion of the perforated or otherwise open part of the well is isolated with packers for the slug test.

Equipotentials for the flow system around a partially penetrating, partially perforated well in an unconfined aquifer after lowering the water level in the well are shown in Figure 2. The numbers along the symmetry axis and the water table represent arbitrary length units. The numbers on the equipotentials indicate the potential as a percentage of the total head difference between the water table (100%) and the open portion of the well (0%) shown as a dashed line.

The value of  $R_0$  for the case in Figure 2 is 96.7 length units. As shown in the figure, this corresponds approximately to the

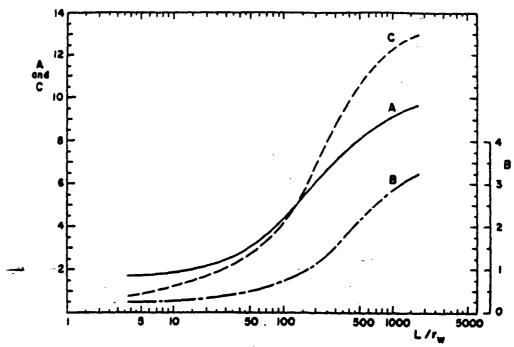


Fig. 3. Curves relating coefficients A. B. and C to L/r.

85% equipotential when  $R_o$  is laterally extended from the center of the open portion of the well. Thus most of the head loss in the flow system occurs in a cylinder with radius  $R_o$ , which is indicative of the horizontal extent of the portion of the aquifer sampled for K or T. The vertical extent is somewhat greater than L, as indicated by, for example, the 80% equipotential in Figure 2.

To estimate the rate of rise of the water level in a well after it is suddenly lowered, (5) can be written as

$$t = \frac{r_e^2}{2KL} \ln \frac{R_e}{r_e} \ln \frac{y_0}{y_e}$$
 (10)

By taking  $y_1 = 0.9y_0$ , (10) reduces to

$$t_{tor_{k}} = 0.0527 \frac{r_{e}^{-1}}{KL} \ln \frac{R_{e}}{r_{m}}$$
 (11)

where  $r_{90\%}$  is the time that it takes for the water level to rise 90% of the distance to the equilibrium level. By assuming a permeable aquifer with  $K=30 \,\mathrm{m/day}$ , a well with  $r_c=0.2 \,\mathrm{m}$  and  $L=10 \,\mathrm{m}$ , and  $\ln{(R_o/r_w)}=3$ , (11) yields  $r_{90\%}=1.82 \,\mathrm{s}$ . Thus if  $y_o$  is taken as 30 cm, it takes 1.8 s for the water level to rise 27 cm, another 1.8 s for the next 2.7 cm (90% of the remaining 3 cm), and another 1.8 s for the next 0.27 cm, or a total of 5.4 s for a rise of 29.97 cm. Measurement of this fast rise requires a sensitive and accurate transducer and a fast-response recorder. The rate of rise can be reduced by allowing groundwater to enter through only a portion of the open section of the well, as can be accomplished with packers.

For a moderately permeable aquifer with, for example, K = 1 m/day, a well with  $r_c = 0.1$  m and L = 20 m, and ln  $(R_0/r_w) = 5$ , (11) yields t = 11.4 s. In this case, it would take the water level 22.8 s to rise from 30 cm to 0.3 cm below static level.

### EXAMPLE

A slug test was performed on a cased well in the alluvial deposits of the Salt River bed west of Phoenix, Arizona. The well, known as the east well, is located about 20 m east of six

rapid infiltration basins for groundwater recharge with sewage effluent [Bouwer, 1970]. The static water table was at a depth of 3m, D = 80 m, H = 5.5 m, L = 4.56 m,  $r_c = 0.076$  m, and  $r_m$ was taken as 0.12 m to allow for development of the aquifer around the perforated portion of the casing. A Statham PM131TC pressure transducer was suspended about 1 m below the static water level in the well (when trade names and company names are included, they are for the convenience of the reader and do not imply preferential endorsement of a particular product or company over others by the U.S. Department of Agriculture). A solid cylinder with a volume equivalent to a 0.32-m'change in water level in the well was also placed below the water level. When the water level had returned to equilibrium, the cylinder was quickly removed. The transducer output, recorded on a Sargent millivolt recorder, yielded the y-t relationship shown in Figure 4 with y plotted on a logarithmic scale. The straight-line portion is the valid part of the readings. The actual y, value of 0.29 m indicated by the straight line is close to the theoretical value of 0.32 m calculated from the displacement of the submerged cylinder.

Extending the straight line in Figure 4 shows that for the arbitrarily selected t value of 20 s, y = 0.0025 m. Thus  $(1/t) \ln y_w/y_t = 0.238$  s⁻¹. The value of  $L/r_w = 38$ , for which Figure 3 yields A = 2.6 and B = 0.42. Substituting these values into (8) and using the maximum value of 6 for  $\ln [(D - H)/r_w]$  (since  $\ln [(D - H)/r_w]$  for the well exceeds 6) yield  $\ln (R_v/r_w) = 2.37$ . Equation (5) then gives K = 0.00036 m/s = 31 m/day. This value agrees with K values of 10 and 53 m/day obtained previously with the tube method on two nearby observation wells [Bouwer, 1970]. These K values were essentially point measurements on the aquifer immediately around the well-bottoms, which were at depths of 9.1 and 6.1 m, respectively.

### COMPARISONS

Piezometer method. The geometry to which (8) and (9) and the coefficients in Figure 3 apply overlaps the geometry of the

prezometer method at the lower values of  $L/r_w$ . With the prezometer method a cavity is augered out in the soil below a prezometer tube. The water level in the tube is abruptly lowered, and K of the soil around the cavity is calculated from the rate of rise of the water level in the tube [Bouwer and Jackson, 1974]. The equation for K is

$$K = \frac{\pi r_u^4}{A r_t} \frac{1}{t} \ln \frac{y_0}{y_t} \tag{12}$$

where  $A_T$  is a geometry factor with dimension of length. Values of  $A_T$  were evaluated with an electrolytic tank analog by *Youngs* [1968], whose results were expressed in tabular form as  $A_T/r_w$  for different values of  $L/r_w$  (ranging between 0 and 8),  $(H-L)/r_w$ , and  $(D-H)/r_w$ .

Taking a hypothetical case where  $L/r_w = 8$ ,  $H/r_w = 12$ , and  $D/r_w = 16$ . K calculated with (5) is 18% below K calculated with (12). This is more than the 10% error normally expected with (8) and (9) for the L/H value of 0.67 in this case. The larger discrepancy may be due to the difference in methodology, or to the fact that the  $L/r_w$  value is close to the lower limit of the range covered on the resistance network analog.

An approximate equation for calculating K with the piezometer method was presented by Hvorslev [1951]. The equation, which is based on the assumptions of an ellipsoidal cavity or well screen and infinite vertical extent (upward and downward) of the flow system, contains a term  $[1 + (L/2r_w)^2]^{1/3}$ . For most well-slug-test geometries,  $L/2r_w$  will be sufficiently large to permit replacement of this term by  $L/2r_w$ . In that case, however, Hvorslev's equation for Q yields  $R_e = L$ , which is not true. In reality,  $R_e$  is considerably less than L. For example, if L = 40 m,  $r_w = 0.4$  m, H = 80 m, and  $D = \infty$ , (8) shows that  $R_e = 11.9$  m, which is much less than the value of 40 m indicated by Hvorslev's equation. However, since the calculation of K is based on  $\ln (R_e/r_w)$  as shown by (5), the error in K is less than the error in  $R_e$  (i.e., 36 and 236%, respectively, in this case).

If, for the above example, the top of the well screen or cavity had been taken at the same level as the water table ( $H=40\,\mathrm{m}$ ),  $R_e$  would have been 8.6 m and Hvorslev's equation would have yielded a K value that is 50% higher than K given by (5). The larger error is probably due to Hvorslev's assumption of infinite vertical (upward) extent of the flow system, which is not met when the cavity is immediately below the water table. Using Hvorslev's equation for cavities immediately below a confining layer would increase the error to 73%, but this, of course, is due to the fact that a water table is not a solid boundary. Hvorslev's equation for the confining layer case can be shown to yield  $R_e=2L$ .

Auger hole method. The analog analyses for (8) and (9) and Figure 3 were performed for L < H, because short circuiting between the water table and the well prevented simulation of the case where L = H. If the analog results are extrapolated to L = H, however, the geometry of the system in Figure 1 becomes similar to that of the auger hole technique, for which a number of equations and graphs have been developed to calculate K from the rise of the water level in the well [Bouwer and Jackson, 1974]. Boast and Kirkham [1971], for example, developed the equation

$$K = C_{\theta R} \frac{\Delta y}{\Delta t} \tag{13}$$

where  $C_{BR}$  was determined mathematically and expressed in tabular form for various values of  $L/r_w$ ,  $(D-H)/r_w$ , and  $y_w/H$ . Since the rate of rise of the water level in the hole after

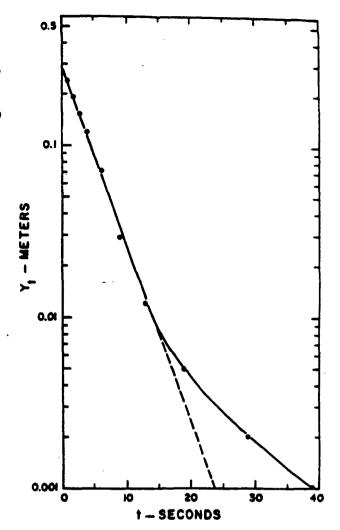


Fig. 4. Plot of y versus s for slug test on east well.

the removal of a slug of water decreases with decreasing y.  $\Delta y/\Delta t$  is not a constant and the value of K obtained with this procedure depends on the magnitude of  $\Delta y$  used in the field measurements. The general rule is that  $\Delta y$  should be relatively small.

Taking a hypothetical case where  $y_0 = 2.5 \text{ m}$ ,  $y_t = 2.4 \text{ m}$ ,  $\Delta t = 10 \text{ s}$ , L = H = 5 m, D = 6 m, and  $r_w = 0.1 \text{ m}$ , (5) yields a K value that is 36% lower than K calculated with (13). However, if  $y_t$  is taken as 0.5 m, which should give  $\Delta t = 394 \text{ s}$  according to the theory that  $(1/t) \ln y_w/y_t$  is constant, the K value yielded by (5) is 26% higher than K obtained with (13). If  $y_t$  is taken as 0.9 m, (5) and (13) give identical results.

Slug test on wells in confined aquifers. The confined aquifer for which the slug test by Cooper'et al. [1967] was developed is an aquifer with an internal water source, for example, recharge through aquitards or compression of confining layers or other material. This situation is similar to that of the unconfined aquifer presented in this paper because the water table is considered horizontal, like the upper boundary of a confined aquifer, and the water table is a plane source. Thus K or T calculated with (5) or (6) should be of the same order as K calculated with the procedure of Cooper et al. [1967], which involves plotting the rise of the water level in the well and finding the best fit on a family of type curves. Cooper et al. [1967] presented an example of the calculation of T for a well

with  $r_c = r_w = 0.076$  m and L = 98 m. The resulting value of Twas 45.8 m²/day. Values of D and H for this well were not given. However, since the well was 122 m deep and completely penetrating (at least theoretically), D and H must have been between 98 and 122 m. Assuming that both D and H were 100 m. (6) yields  $T = 62.8 \text{ m}^3/\text{day}$ , which is compatible with Tobtained by Cooper et al.

### CONCLUSIONS

The hydraulic conductivity of an aquifer near a well can be calculated from the rise of the water level in the well after a slug of water is suddenly removed. The calculation is based on the Thiem equation, using an effective radius R. for the distance over which the head difference between the equilibrium water table in the aquifer and the water level in the well is dissipated. Values of R, were evaluated by electrical resistance network analog. An empirical equation was then developed to relate Re to the geometry of the system. This equation is accurate to within 10-25%, depending on how much of the well below the water table is perforated or otherwise open. The technique is applicable to partially or completely penetrating wells in unconfined aquifers. It can also be used to estimate the hydraulic conductivity of confined aquifers that receive water from the upper confining layer through recharge or compression.

The vertical distance between the rising water level in the well and the equilibrium water table in the aquifer must yield a straight line when it is plotted on a logarithmic scale against time. This can be used to check the validity of field measurements and to obtain the best-fitting line for calculating the hydraulic conductivity. Permeable aquifers produce rapidly rising water levels that can be measured with fast-response pressure transducers and strip chart recorders or x-y plotters. The portion of the aquifer sampled for hydraulic conductivity with the slug test is approximately a cylinder with radius R. and a height somewhat larger than the perforated or otherwise open section of the well.

Hydraulic conductivity values obtained with the proposed slug test are compatible with those yielded by the auger hole and piezometer techniques where the geometries of the systems overlap, and by a slug test for completely penetrating wells in confined aquifers.

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> (Received June 2, 1975: revised January 19, 1976; accepted January 23, 1976.)

GRACE

**Polyfibron Division** 

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W R² Grace & Co 55 Hayden Avenue Lexington, Mass 02173

(617) 861-6600

February 11, 1988

Richard J. Chalpin
Deputal Regional Environmental Engineer
Department of Environmental Quality Engineer
Metropolitan Boston Northeast Region
5 Commonwealth Avenue
Woburn, Massachusetts 01001

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LEGAL PEPARTMENT

Subject: Canton - ERB-N87-1435

Technical Information Submittal

Dear Mr. Chalpin:

In accordance with your request for technical information pursuant to M.G.L. Chapter 21E regarding the release of oil at our Walpole Street property, the following information is being provided in the order of questions directed in your January 13, 1988 letter:

 On October 9, 1987, during demolition and excavation for new construction at our Walpole Street property, oily water and soil were discovered. Oil was encountered five to seven below present grade when the existing building foundation was being demolished.

The approximate location of the oil encountered is designated in Figure 1. The areal extent of the oil was approximately 25 square feet and approximately two feet in depth. Because the oil was encountered below what had been an existing building, (circa 1840s) the origin of the oil could not be determined. Interviews with Emerson & Cuming personnel failed to provide us with insight into the source of the oil. Although a brick structure was found in close proximity to the oil, the purpose of the structure and its association with the oil is not known. Neither pipes nor containers were found in the vicinity of the oil, therefore, it's presumed that the oil release was an isolated incident, and not associated with activities resulting from Emerson & Cuming operations which began in-1958, nor those under W. R. Grace & Co. ownership from 1978 to present.

2. On October 9, 1987, shortly after the oil was discovered, the Canton Fire Department, the Canton Board of Health, and the DEQE were notified for emergency response. Representatives from each department responded and visited our site on the date of notification. Based on recommendations by DEQE representative Mr. Victor Fonkem, the liquid phase of the oil was removed immediately (State Manifest C452332, Table 1). Removal of

600 gallons of oily water was accomplished by contracting a local waste oil service company, Cyn Oil Corp. of Stoughton, Mass. (Table 1). In accordance with Mr. Fonkem's guidance, oily soil was excavated from the area, stockpiled onto polypropylene sheeting to prevent the spread of oil, and covered with the same protective material. To ensure all oily material was removed from our property, 78 cubic yards (171,600 lbs) of additional material were excavated (Figure 1). The determination of "clean" soil was based on visual inspection. Following site remediation, clean fill was brought in to grade the excavated area.

3. The quantity of oily water removed from the area totaled 3800 gallons. The amount of oily soil removed, including the additional material to ensure "clean" was "clean", was 80 cubic yards (176,000 pounds). It is estimated that only two cubic yards of soil were contaminated with the oil.

Table 1 chronologically lists the manifests which accompanied the waste shipments from the Canton site.

- 4. Photocopies of all waste manifests, which accompanied the oily water and soil shipments, are attached (Att:1). Contractors who provided transportation service included Cyn Oil Company of Stoughton, MA and Jet-Line Services of Lowell, MA, approved waste oil and hazardous waste transporters and storage facilities, respectively. The shipments of oily soil were transferred from Jet-Line Services to Stablex Canada, Inc. of Quebec Canada for final disposition. The manifests accompanying shipments from Lowell to Canada have been included for your reference (Att:2).
- 5. Representative samples of oily water and soil were analyzed by Jet-Line Analytical Laboratory. Results of the EPA analytical methods are attached (Att:3).

One of the battery of tests conducted by Jet-Line Analytical Laboratory was the Extraction Procedure (EP) Toxicity analysis. (40 CFR Part 261 Appendix II; Att:3). According to the analytical results, the oily soil was not contaminated with EP Toxic metals. However, manifests accompanying the soil to the designated hazardous disposal facility characterized the soil as being contaminated with arsenic (D004), chromium (D007), and lead (D008). Because of discrepancies between the analytical results and the manifests, a manifest discrepancy complaint was filed with Jet-Line Services to re-evaluate the hazardous waste characterization codes on the manifests.

6. The oily soil encountered during demolition and excavation for new construction did not result from current operations or

### Page 3

recent management practices at the Canton facility. As stated in \$1, the oil was found beneath a foundation where there were no indications of conduits to that area. Consequently, no further action is required to prevent the incident from reoccurring.

As stated in previous reports to the Commonwealth, the Emerson & Cuming plant has made a number of changes in their materials handling and storage. Changes included discontinuing outside hazardous material storage, redesignating raw material storage areas inside the building (1984), staging a storage area inside the building for empty drums, and closing the head of the raceway at the pond. Hazardous waste is collected periodically by a waste hauler to eliminate long term storage.

Regarding the identification of PCBs in DEQE soil sample #028239 taken in the vicinity of the new manhole (Figure 1) on November 16, 1987, we are confident that the finding was not the result of any Emerson & Cuming or W. R. Grace & Co. activity, and that the source of the finding did not originate on our property.

During excavation of the manhole, groundwater exhibiting an oily sheen was observed. The oily water was pumped out by Cyn Oil of Stoughton, MA and sent to Hitchock Terminal for final disposition (Att:4). The oily sheen was the result of flow from a disconnected stormwater drainage pipe which collects stormwater runoff from Neponset Street and Walpole Street. The oily water was not the result of Emerson & Cuming activities.

Sincerely,

Rosanne M. Joyce
Environmental Engineer

cc: J. F. Murphy, Jr.

**Rark Stoler, Cambridge/
J. L. McAfee

R. Olson - Canton

Att:4

RMJ/kmb

TABLE 1. HAZARDOUS WASTE MANIFESTS

	STATE		
DATE	MANIFEST NUMBER	WASTE	QUANTITY
10-09-87	C452332	Oily Water	600 Gals
10-19-87	C454033	Oily Water	100 Gals
10-21-87	C454005	Oily Water	600 Gals
11-04-87	C326257	Oily Water	2500 Gals
11-04-87	C326260	Soil -	17 yds ³¹
11-16-87	C336156	Soi1	17 yds ³
11-16-87	C336157	Soil	17 yds ³
11-16-87	C336158	Soil	17 yds ³
11-16-87	C336159	Soil	17 yds ³
11-18-87	C337090	Soil	$17 \text{ yds}^3$
11-18-87	C337091	Soil	17 yds ³
11-18-87	C326275	Soil	17 yds ³

QUANTITY OF SOIL APPROXIMATED IN CANTON AND ADJUSTED ACCORDINGLY AT STABLEX CANDA, INC.

# ATT:1 HAZARDOUS WASTE MANIFESTS FROM EMERSON & CUMING TO JET-LINE



# DEPART OF ENVIRONMENTAL QUALITY GINEERING DIVISION OF SOLID AND HAZARDOUS WASTE

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# DIVISION OF SOLID AND HAZARDOUS WASTE

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Form Approved OMB No. 2050-0038, Expres 9-30-88 EPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete.





### **GINEERING** ENT OF ENVIRONMENTAL QUALIT DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street

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	incod/Typed Name IRALD E. McCARTHY		34	Terelol	, Σ,	ILLI	utte	Month	レンドブ

Form Approved CARE No. 2050-0039, Expires 9-30-88
EPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete.

# In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

W



# DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street
Boston, Massachusetts 02108

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n, Massachusetts 02108

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15. Species Handling Instructions and Additional Information			<b>3</b> *
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18 GENERATOR'S CERTIFICATION: I haveby declare that the contents of this consignment are fully and accurately de proper shapping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for		<b>v</b>	
according to applicable international and national government regulations.			
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18. Transporter 2 Acknowledgement of Receipt of Materials			Date
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Bitth Tube writer .

JOINT HAZARDOUS Generator JS EPA ID No Manifest 2 Page 1 information in **WASTE MANIFEST** 's not required by A. State Manifest Document No. 1 3. Generator's Name and Mailing Address W.R. Grace / Emerson Curmings 59 Walpole Street B. State Gen. ID 4 Generator's Phone 1 617 1 821 4250 Canton, St. 02021 5300 5. Transporter 1 Company Name US EPA ID Number C.State Trans. ID Jet-Line Services, Inc. NADOGALIZAGA M 및 기기 4 D. Transporter's P 7. Transporter 2 Company Name US EPA ID Number 9. Designated Facility Name and Site Address US EPA ID Number Geochem-D/B/A/ Jet-Line of Lowell F. Transporter's Phone ( Not Rea G. State Facility's ID 263 Howard Street Lowell, Ma. 01852 NNDO4707577 H. Facility's Phone ( 12. Containers 14. 13. 11, US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Total Unit Type Quantity No WtVol Hazardous Waste Solid ORME NA 9189 (DOOS) 0 0 1 DIT 0 0 0 17 OR J. Additionnal Descriptions for Materials Listed Alliove (Include physical state and fiazard code.) Vestes Listed Above contaminated soil w/le 15. Special Handling Instructions and Additional Information 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by ing name and are class fied, packed, marked, and tabe If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determ and that I have selected the practicable ( can afford Day Printed/Typed Name Sioneture KORIAN pent of Receipt of Materials Ofte Acknow 18 Transporter Signature Month Day Printed/Typed Name 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Printed/Typed Name Signatura Dev form 8700-22 (Rev. 9-86) Previous editions are obsolete.

call the National Response Center (800) 424-8802.

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GENERATOR-MAILED BY TSDF





# `OMMONWEALTH OF MASSACHUS' TS DEPART ....ENT OF ENVIRONMENTAL QUALITY ....GINEERING DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street Boston, Massachusetts 02108

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One Winter Street Boston, Massachusetts 02108

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In case of emergency or spill, immediately call the National Response Center (800) 424-8802.

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### COMMONWEALTH OF MASSACHUSFTTS **DEPAR ENT OF ENVIRONMENTAL QUALIT** *IGINEERING* DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street Boston, Massachusetts 02108

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20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by

EPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete.

Date

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# DEPAR. JENT OF ENVIRONMENTAL QUALITY LINGINGERING DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street Boston, Massachusetts 02108

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# DEPART...ENT OF ENVIRONMENTAL QUALITY _ . GINEERING DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street

	Boston, Massachusetts 02108	
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	UNIFORM HAZARDOUS	1. Generator US EPA		anifest	2 Pa	e 1 ! Information	n in the shad	Pf 21625
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ì	4 Generator's Phone 1 617 day 4250	Canton, Ma. 02				· 89328		
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GENERATOR	9. Designated Facility Name and Site Address	10.	US EPA ID Number			1111		11
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.	11. US DOT Description (Including Proper Ship)	ping Name, Hazerd Class,	and ID Numberl		1	Total	14 Unit	Waste No
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	J. Additional Descriptions for Materials Listed /	Above (include physical sti	nte and hazard code.)		K. Ha	ndling Codes for W	astes Listed	Above
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7	17. Transporter 1 Acknowledgement of Re	ceipt of Materials						Date
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L	20. Facility Owner or Operator: Certification of	receipt of nazardous mate	mais covered by this manifest	except as	not <b>ed</b> in	item 19.	F	0
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r D	<b>4</b> Form 8700-27 (Rev. 9-86) Previous edition	an ara absolute		-	•			



# OMMONWEALTH OF MASSACHUSFTS DEPART...ENT OF ENVIRONMENTAL QUALITY ...GINEERING DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street Boston, Massachusetts 02108 93-11951

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ļ	4. Generator's Phone ( ) Canton, Ma. U2U2I			same.		·
ł	5, Transporter 1 Company Name 6. US EPA ID Number			te Trans. ID		
1		9890		2683	2	
١	7. Transporter 2 Company Name 8. US EPA ID Number		D. Tr	maportar's Phone	1 6171	344_2510
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Ì	9. Designated Facility Name and Site Address 10. US EPA ID Number		-		1111	<u> </u>
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	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	No.	Туре	Total Quantity	Unit Wz/Vol	Waste No.
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Ì	15. Special Handling Instructions and Additional Information:					
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	20. Factory Owner or Operator: Certification of receipt of hazardous materials covered by this manife	esi excent as	noted in	item 19.	<del></del>	
	20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manife	est except as	noted in	1)tem 19.		Date
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EPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete.

ATT:2

HAZARDOUS WASTE MANIFEST

FROM JET-LINE

TO SABLEX-CANADA

One Winter Street · .
Boston, Massachusetts 02108

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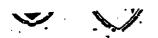


# DIVISION OF SOLID AND HAZARDOUS WASTE

### One Winter Street

Boston, Massachusetts 02108

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Boston, Massachusetts 02108

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giff am a turge quantity generator, I certify that I have			
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### DIVISION OF SOLID AND HAZARDOUS WASTE One Winter Street

Boston, Massachusetts 02108

od for use on elite (12-pitch) typewriter.)

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Ī	3. Generator's Name and Mailing Address								
1	Geochem, Inc., d/b/a Jet-Line of Lowell					A. State Manifest Dacument Number MA C 335706			
	263 Howard St., Lowell, MA 01852					B. Sta	ite Gen. ID		
ŀ	4. Generator's Phone ( 617-937-7294	6.	US EDA IO	M.S.		-	SAME	·	
	5. Transporter 1 Company Name 6. US EPA ID Number  Jet-Line Services, Inc. MIAIDI016121117191819					i	te Trans, IO		
ŀ	7. Transporter 2 Company Name 8. US EPA 10 Number						21714151		<del></del>
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-	Rlainville, Justec JTE 4	17IN	IN PRIBIDIAL	712161	41715	H. Fa	cility's Phone (	514-430-	9230
-	11. US DOT Description (Including Proper Shippin	ng Name, Hazard Clas	is, and ID Number)		12. Cont	•	13, Total	14. Unit	I. Waste No.
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	according to applicable international and national gov			_					
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إ	20. Facility Owner or Operator: Certification of r	ecaipt of hazardous m	aterials covered by th	is m <b>a</b> frifes	t except as	noted in	nitem 19.	· · · · · · ·	
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ATT:3

WASTE ANALYSES



Poplar,

### JET-LINE ANALYTICAL LABORATORY

# **CERTIFICATE OF ANALYSIS**

Larry Tonks

W.R. Grace-Emerson Cummings

Job No. 03-12962

P.O. A-6209

Page 1 of 2

Date Reported: 10/23/87

Date Received: 10/14/87

Profile Number: 61673

Lab Numbers LO 1713

Sample Description: Solid/Semi-Solid: Contaminated Soil

PARAMETER	FOUND	DETECTION LIMIT	METHOD
ph, SU	6.0	1-14	EPA 9040
Cyanide, mg/Kg	ND	0.01	EPA 9010
Sulfide, mg/Kg	ND	0.1	EPA 9030
Plash Point, Or	> 200	200	EPA 1010 -
E.P. Toxicant Metals, mq/L			EPA 1310
Arsenic	ND	.005	EPA 7060
Bacium	.015	.002	EPA 7080
Cadmium	ND	0.005	EPA 7130
Chromium (+6)	0	0.1	EPA 7190
Lead	ND	0.100	EPA 7420
Hercury	ND	.0002	EPA 7471
Selenium	.019	.002	EPA 7740
Silver	.002	0.020	EPA 7760
VOC, Total, ppb		e Attached	EPA 5030/8240
PCB, mg/Ky	ИD	0.1	EPA 8080
Metals, Total, mg/Kg			EPA 3050
Arsenic	ND	0.005	EPA 7060
Barium	28-94	0.002	EPA 7080
Cadmium	0.711	0.02	EPA 7130
Chromium	21.05	0.02	EPA 7190
Lead	51.57	0.02	EPA 7420

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### CERTIFICATE OF ANALYSIS

Page 2 of 2

CLIMT: Jet Line Services

ANALYSIS REQUESTED: Purgeable Organics 624

TOXINON: 870-1078

CLIENT LDENT: LO 1713

DATE SUPLED: 10/15/87

SAMPLE LOCATION:

DATE PEPOF TED: 10/21/87

SMOTE DESCRIPTION:

water x soil

SAMPLE CONTAINER:

plastic x VOA

other: other:

011

FIELD PREP:

PARAMETER	RESULTS MOL-			DATE OF		
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Chloromethane	-	2.0				
Brommethane	~	2.0				
Vinyl Chloride	-	10.0				
Chloroethane	-	2.0				
Methylene Chloride	-	10.0				
Acetone'	-	30.0				
Carbon Disulfide	-	2.0				
1.1-Dickloroethens	-	2.0				
1,1-Dichloroothane	-	2.6				
Trans-1,2-Dioblorosthems	-	2.0				
Caloroform	-	2.0				
1.2-Dichloroethane	-	2.0				
2-Butanone	-	10.0			· ·	
1,1,1-Trichloroethane	•	2.0	•			
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Trans-1.3-Dichloropropens	-	2.0	•			
Trichloroethene	_	2.0				
Dibromochloromethane		2.0				
1.1.2-Trichlorosthans	_	2.0				
Jenzene	1,000	2.0				
Cis-1.3-Dichlorepropens	-,000	2.0				
2-Chloroethylvinyl Ether	_					
Bronoform	_	2.0				
Z-Henagone	_	2.0				
l-Methyl-2-fentanone	•	4.0				
[etrachloroethene	-	1.0		•		
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hlorodenzene	•	2.0			•	
Sthylhenzene	6,923	3.0				
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lotal Lylenes	10,2 <b>89</b> .	3.0		•		

Non-Detectable.



### **IET-LINE ANALYTICAL LABORATORY**

# **CERTIFICATE OF ANALYSIS**

Larry Tonks Tœ:

11/9/87 Date Reported:

urrurie jeaj.

W.R. Grace - Emerson Cummings

11/5/87 Date Received:

Job # 03-12962 P.O. A 6225

Profile Number: None

Lab Number:

LO 1759

Sample Description: Liquid; Water Phase: High Plash (>1000g)

PARAMETER	ANALYSIS	DETECTION LIMIT	METHOD
pH, S.U.	6.5	1-14	EPA 9040
Flash Point, OP	> 200	200	EPA 1010
Phenol, mg/l	7.5	0.1	EPA 8040
Oil and Grease, mg/l	51.3	ı ·	'SM 503 A
PCB, mg/kg	ND	1	EPA 8080
Cyanide, mg/l	ND	0.01	EPA 9010

MPC FRK Analyst:

Our reports and letters are for the exclusive use of the client and Jet-Line only. They cannot be reproduced in whole or in part without written permission by Jat-Ilm. This report applies only to the sample tested and not be apparently identical or similar samples. The client agrees to indemnify and hold harmless fee Line Services, Inc. from any liability arising out of any use of the regults of such tests. Unused samples will be retained for a maximum of thirty (36) days unless otherwise notified.

# ATT:4 HAZARDOUS WASTE MANIFESTS AND ANALYSES



#### CHI UF ENVIRONMENTAL QUALITY DIVISION OF SOLID AND HAZARDOUS WASTE

#### One Winter Street Boston, Massachusetts 02108

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### COMMONWEALTH OF MASSACHUSTITS DEPAR IENT OF ENVIRONMENTAL QUALIT NGINEERING DIVISION OF SOLID AND HAZARDOUS WASTE

One Winter Street Boston, Massachusetts 02108

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	3. Generator's Name and Mailing Address Emergeon Commings 59 Walpole St. Cambon, MA 0202		A. State Manifest Document Number MA C242811  B. State Gen. ID						
	4. Generator's Phone ( 617 ) 821-4250		Same						
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### DEPARTMENT OF FEVENORMINIAL QUALITY ENSURTHING DIVISION OF SOUR AND HAZARDOUS WAS IF

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Boston, Massachusatts 02108

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#### HITCHCOCK GAS ENGINE CO. 50 CROSS ST. 'BRIDGEPORT, CT 06610

. January 18, 1988

Gerald E. McCarthy Cyn Oil Corp. 1771 Washington St. Stoughton, MA 02072

Dear Gerry:

As per our telephone conversation today, test results for the load of waste water delivered to our facility on 11/18/87 under menifest # HA C242813 are as follows:

Chromium - .03 ppm

Lead - .65 ppm

Based on our experience with your materials these are the most likely contaminants and were the only metals tested for.

If your have any questions please call me at 203-334-4812.

Aincorply.

John F. Sieckhaus Jechnical Director GRACE

**Polyfibron Division** 

W.R. Groce & Co. 55 Hayden Avenue Lexington, Mass. 02173

(617) 861-6600

December 29, 1987

Mr. Steven Roy
Department of Environmental Quality Engineering
5 Commonwealth Avenue
Woburn, MA 01801

RE: Emerson & Cuming, Inc.
59 Walpole Street, Canton, MA 02021
DEQE Sample No. 028239, 11/16/87

Dear Steve:

On Wednesday, December 23, 1987, I conducted a field test of soil, on and proximal to, the Emerson & Cuming property in Canton, Mass. The impetus for the field screening test came as a result of a soil analysis (sample #028239; 11/16/87) conducted by DEQE which showed a PCB concentration of 160 ug/g. The soil was removed from an excavated area in the northwestern portion of our property (Figure 1).

The purpose of Grace field testing was to determine if PCBs were present in the soil in other areas of the property, and to consider potential sources of PCBs found in DEQE sample #028239.

In accordance with the procedure outlined in the Dexsil Chlor-N-Soil Test Kit, I collected ten soil samples. Eight of the soil samples were taken from Emerson & Cuming property and two were obtained on the south side of Walpole Street across from the demolition area. The sampling points are identified in Figure 1. The testing procedure was followed carefully and provided the following results: positive indicators for Sample Points 4 and 8.

The field screening test indicates that there is a potential for PCB contamination greater than 50 ppm on the Emerson & Cuming property which may be serving as a receptor to an upgradient source. The upgradient area adjacent to the Emerson & Cuming plant is occupied by a utility substation and several pole mounted transformers. Transformers are one of the primary sources of PCBs. If a release did occur, the PCB contaminated fluid would follow the established drainage patterns which includes the stormwater drainage system that traverses the Emerson & Cuming property. The results are not intended to be conclusive. For your reference, I have included a copy of the Chlor-N-Soil Test Kit instructions (attachment 1).

In an effort to more fully understand the source of PCB contamination on the Emerson & Cuming property, I have contacted Francis Lee, Environmental Affairs Manager of Boston Edison. Mr. Lee agreed to provide a history of the substation located off Walpole Street.

Mr. Steven Roy December 29, 1987 Page 2.

I will keep you informed of any developments in this area.

Sincerely,

RosanniM. Joyce

Rosanne M. Joyce Environmental Engineer

RMJ:kc

Attachments

cc: J.L. McAfee, Lexington

J.F. Murphy, Jr., Lexington

J.R. Fralich, Jr., Canton Board of Health

P.W. Ciriello, Canton R.M. Olson, Canton S. RUSSELL SYLVA
Commissioner
935-2160

The Commonwealth of Massachusetts
Department of Environmental Quality Engineering
Metropolitan Boston - Northeast Region
5 Commonwealth Avenue
Woburn, Massachusetts 01801

January 13, 1988

W.R. Grace & Company 55 Hayden Avenue Lexington, MA 02173 RE: CANTON - ERB-N87-1435

W.R. Grace & Company
Walpole Street
NOTICE OF RESPONSIBILITY/REQUEST
FOR TECHNICAL INFORMATION PURSUANT
TO M.G.L. CHAPTER 21E

Attention: Peter W. Ciriello, Project Engineer

Dear Mr. Ciriello:

On October 9, 1987, Department personnel investigated reports concerning the release of an unknown quantity of waste oil at the above referenced site. This incident was realized when an obsolete brick pit containing oil was ruptured during the demolition and excavation for new construction. Initial field investigations indicated soil and groundwater contamination.

Through your authorization, Cyn Oil Co. was hired to pump out product and contaminated groundwater while Jetline Services Inc. was hired to remove, and stockpile on site, all contaminated soil.

On November 9, 1987, the construction crew encountered a thin film of oil on the of groundwater in another location on the same site. Initial field screening of sall samples for volatile organic compounds (VOCs), using an H-NU photoionization detector, showed readings of over 50 ppm. Further excavation was discontinued until your engineering consultants - Haley & Aldrich - could assess the extent of release and contamination.

Such incident is governed by Chapter 21E of the General Laws of Massachusetts (hereinafter "M.G.L. Chapter 21E"), the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, which was enacted on March 24, 1983.

Chapter 21E identifies as responsible parties the current owner or operator of a site at which there has been a release or threat of release of oil or a hazardous material; the past owner or operator of a site where a release of hazardous material has occurred; any person who directly or indirectly arranged for the transport, disposal, storage or treatment of hazardous materials to or at such a site; and any person who caused or is legally responsible for a release or a threat of release of oil or a hazardous material at such a site. Such parties are liable without regard to fault; the nature of this liability is joint and several. (X.G.L. Chapter 215, Section 5a).

This letter is to inform you in writing that:

- (1) The Department has determined that a release or threat of release of waste oil has occurred at the subject site.
- (2) Information available to the Department indicates that you as operator/owner of the subject site, are a liable and "responsible" party pursuant to Section 5(a) of Chapter 21E.
- (3) Additional information is needed to better evaluate the need for further emergency response action at this site.
- (4) Should you fail to implement those actions deemed necessary by this Office, the Department may, pursuant to M.G.L. Chapter 21E, take or arrange for any and all necessary actions at the site. If public funds are expended under such conditions, Chapter 21E, Section 11 stipulates that the Attorney General of the Commonwealth of Massachusetts may initiate legal action against the responsible party(s) to recover all costs incurred by the Department in the assessment, containment, and removal of any release or threat of release of oil or hazardous materials.
- (5) The liability of responsible parties in (4) above includes:
  - a. Administrative costs incurred by the Department in handling this matter (in simple spill cases, administrative costs incurred by the Department prior to formal legal action are at least \$1,000);
  - b. Interest charges on the total liability at the statutory rate of 12% compounded annually;
  - c. Treble damages (i.e., three (3) times the total amount of response costs the Department incurs); and
  - d. All damages for the injury, destruction or loss of natural resources due to the release.

This liability constitutes a debt to the Commonwealth. The debt, together with interest, creates a lien on all your property in the Commonwealth. In addition to the foreclosure remedy provided by the lien, the Attorney General of the Commonwealth may recover that debt or any part of it in an action against you. You may also be liable under M.G.L. C.21E Section 11 for up to \$100,000 in fines or penalties for each violation of C.21E as well as for additional penalties or damages pursuant to other statutes or common law.

W.R. Grace & Co. Page 3

On October 19, 1987, at approximately 1:00 p.m., Department personnel verbally notified you of your responsibility for such release/threat of release. You accepted such responsibility at that time.

Your acceptance of responsibility for such release means that: (1) you have entered into a contract with a cleanup contractor, approved by the Department named, Cyn Oil Co. and Jetline Services Inc. to take all necessary emergency remedial response actions (containment, assessment and/or removal actions) relative to such release; and (2) pay for all response costs incurred by the Department due to such release.

Pursuant to the Department's authority to perform information-gathering activities and its authority to investigate, sample and inspect records, conditions, equipment, practices or property under M.G.L. C.21E Sections 2, 4 and 8, you are directed to provide to the Department, within fifteen (15) days of the date of this 2/11/88 per 5. Johson on 1/25, letter:

- a brief account of why, how and where such release/threat of release occurred; and
- a brief description of all assessment, containment and/or removal actions that have been and/or will be taken relative to such release/threat of release; and
- an estimate, to the best of your knowledge, of the quantity of oil/hazardous material released: and
- photocopies of all waste manifests for the oil/hazardous material released; (4) laboratory results from a DEQE-approved laboratory of soil/water samples
- taken from the cleaned up environmental media impacted by the release; and
- a detailed description and a timetable of measures you plan to implement to prevent future recurrence of such incidents.

You are hereby notified that failure to respond to this letter may subject you to legal action including criminal prosecution, court-imposed civil penalties, administrative orders or civil administrative penalties assessed by the Department.

It is to your advantage to respond to this request for information in an adequate and timely manner, demonstrating that you have acted appropriately in taking necessary response actions relative to this release/threat of release of oil and/or hazardous materials.

W.R. Grace & Co. Page 4

Depending on the information generated by the above work, the Department may require additional investigations, studies and actions. If you fail to take these actions or if you fail to perform these tasks in accordance with the standards of the Department, the Department may perform response actions in your stead and recover it cests from you in accordance with the provisions described above.

Your cooperation in this matter in promptly accepting responsibility and initiating emergency remedial measures relative to this release is appreciated. Please excuse the legalistic tone of this letter, we are compelled by regulatory policy to outline statutory provisions relative to your potential liabilities at the

Your response to the requested information and any further questions regarding this matter should be directed to Victor Fonkem at the letterhead address or 935-2161 and refer to case number ERB-N87-1435.

Richard J. Chalpin

Deputy Regional

Environmental Engineer

#### RJC/VF/ae

cc: Frank Sciannameo, DEQE, OIR, One Winter St., Boston, MA 02108 BOH, Town Hall, Canton, MA 02221

Fire Dept., 99 Revere St., Canton, MA 02021

Jim Miller, DEQE, Enforcement, One Winter St., Boston, MA 02108

NERO, Site Assessment Section, Attn: Steve Johnson

Enclosures: (1) Brief Synopsis of M.G.L. Chapter 21E

- (2) Minimal Standards for the Submission of Analytical Data
- (3) List of DEQE-Licensed Spill Cleanup Contractors

## REPORT ON VADOSE ZONE SCREENING STUDY EMERSON & CUMING WALPOLE STREET PLANT CANTON, MASSACHUSETTS

For

W.R. Grace & Company Lexington, Massachusetts

File No. 650000

December 1987



Consulting Geotechnical Engineers, Geologists and Hydrogeologists

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28 December 1987 File No. 6500

W.R. Grace & Company 55 Hayden Avenue Lexington, Massachusetts 02173

Attention: Mr. James F. Murphy

Subject: Vadose Zone Screening Study

Emerson & Cuming Walpole Street Plant

Canton, Massachusetts

#### Gentlemen:

This report summarizes the information Haley & Aldrich, Inc., obtained during a recent investigation of the vadose zone on the above referenced site. This work was carried out in accordance with our proposal dated 19 October 1987.

#### Introduction

The Massachusetts Department of Environmental Quality Engineering, Division of Water Supply (DEQE), is conducting a groundwater contamination investigation of the Upper Neponset River Valley Aquifer. The DEQE's contractor for this study is SEA Consultants, Inc. (SEA).

One of the wells in the aquifer is Canton's Well #7. Well #7 is located on the opposite side of the East Branch of the Neponset River, about 800 feet north of the western end of the Emerson & Cuming Walpole Street property. We understand that low concentrations of volatile organic compounds (VOCs) have been detected sporadically at very low concentrations over the past several years in the water from Well #7. SEA requested permission from W.R. Grace & Company, present owners of the property, to conduct a site-specific investigation to determine

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if the contamination detected in the groundwater in Canton's Well #7 could be coming from the site. Grace gave permission for the investigation but requested that Haley & Aldrich conduct the field work. DEQE granted this request.

The field work required by DEQE was reviewed by H&A. Changes in the requested work scope were negotiated both before and during the field work. This report presents the procedures and results of our work as approved by SEA and DEQE.

#### Site Location

The site is located at the intersection of Walpole Street and Neponset Street in Canton, Massachusetts, as shown in Figure 1. The site is bounded by the East Branch of the Neponset River to the north, Neponset Street to the east, and Walpole Street and residences to the south. The property is currently occupied by the Polyfibron Division of Emerson & Cuming which is owned by W.R. Grace & Company.

#### Present Site Conditions

The site consists of two sections: the main manufacturing area as shown in Figure 2 and the wooded area as shown in Figure 3. The site conditions in the manufacturing area as shown in Figure 2 existed prior to the demolition and construction activities which started about two months ago. Since then, the western third of the main building and the separate structure at the western side of the site have been demolished. Sewer and gas utilities in this area have been replaced and relocated. The soil in the western third of the site has been disturbed and regraded in association with the construction work. The soil in this area is exposed at ground surface and has a similar topography to that previously present on site. A new foundation has been constructed in place of the demolished main building, and the steel beams are being erected. The new building will be used for existing manufacturing.

A raceway which is blocked off at its entrance in the pool above the falls exists under the building. Records indicate that three groundwater sumps under the building, non-contact cooling water for air conditioners, floatation pressure test water, and rainwater from the roof flow into the raceway. This water, plus surface water runoff from Walpole Street and possibly some groundwater discharge at the outfall into a mill race.



The wooded area consists primarily of lowland with a mixture of softwood and hardwood trees. The undergrowth is dominated by briars and poison ivy. The mill race which passes through this area roughly parallels the river and enters the river about 1,600 feet from the head of the mill race where the storm water drainage pipe outfalls.

The mill race is about 10 to 20 feet wide and contained standing water at the time of this study. This water level probably represents the natural groundwater table. A bank about three feet higher than the surrounding land exists on the northern side of the mill race. The bank is vegetated with trees that are about the same age as those on the surrounding land. Due to the configuration of the mill race and age of the vegetation, it appears that the trench and banking were constructed at about the same time. On the southern side of the trench, the land slopes up sharply about 20 to 30 feet. The drainage pipe outfall at the head of the mill race is almost completely filled with sediment. Water discharges from the outfall during dry periods at a very low flow rate.

Approximately 800 feet west from the outfall, the land narrows to about a 15-foot wide strip of land with a stone wall on the river side. The remainder of the wooded land to the intersection of the mill race and the river was not investigated due to the thickness of the undergrowth.

At the same time this site investigation was being undertaken, an approximately 8-foot deep pit was excavated in the northwest corner of the site to construct a manhole in an existing concrete surface water drainage pipe. Styrofoam and other debris were observed in the fill material. It was reported that the excavation was dry until a section of the pipe was removed, when water with an oily film on the surface flowed into the pit. Since this pipe drains surface water from Walpole Street, it is assumed that the water washed the oil from the street. The approximate location of the pit is shown on Figure 2.

#### Site History

Beginning in the 1800s, the buildings on site were used by the Neponset Woolen Mills. Power was supplied to the mill via a raceway that started at the pool above the water fall, ran under the building, and discharged from the outfall located at the head of the mill race. The exact location or construction



of the raceway under the building is not known, though it reportedly has a soil base. The site was inactive for many years during the first half of the 1900s until Emerson & Cuming, Inc. purchased the site in the late 1950s. W.R. Grace then bought the company in 1978.

The company has manufactured foam floatation products made of foam pellets and epoxy resin for the oil and gas industry; microwave absorber products; dielectric compound products; and conductive coating products. A wide variety of liquid raw materials have been used on site. Epoxy resins, an anhydride, and a latex acrylate copolymer were the raw material liquids used in the largest quantities. Volatile organic compounds used in bulk quantities include methylene chloride, toluene, and xylene. Methylene chloride was recycled in a distillation apparatus on site.

Prior to 1982, materials were handled and stored in the following manner. Sanitary waste and boiler blowdown was discharged to the MDC sanitary sewer system. The floor drains in the building discharged to the raceway. Drums of liquid raw materials were stored on pavement at the western end of the parking lot along the northern boundary of the site. This storage was additional to the above ground bulk chemical storage tanks along the northern edge of the building. The plant stored their drummed hazardous waste in a diked, roofed area near the northwest corner of the property. These areas are shown on Figure 2.

From 1982 to 1984, the Emerson & Cuming plant made a number of improvements in their materials handling and storage. These improvements were made in agreement with Canton town officials, the DEQE, Emerson & Cuming plant management, and Camp Dresser & McKee (CDM).

Projects to improve materials handling included:

- o construction of a temporary berm around the drummed raw material storage area,
- o transfer of the raw and hazardous material storage areas inside the building in late 1984,
- o removal of the empty drums stored outside,
- o creation of a staging area inside the building for empty drum storage,



- o blocking off floor drains in the building, and
- o the closure of the head of the raceway at the pond.

Two sets of water samples were collected from the site and chemically analyzed for selected VOCs. The sampling dates, locations, and chemical analysis data are listed in Table II. The data indicate that two VOCs were detected: dichloroethane at a concentration of 21 ppb and methylene chloride at concentrations of 4.2 and 10.1 ppb. Methylene chloride was detected only in the set of samples collected in July 1984. This indicates that either it's presence was intermittent or the data are an artifact of the analysis procedure and this compound was not actually present in the samples.

#### Vadose Zone Screening Methods

The vadose zone screening procedure described in this section was approved by DEQE before the work began. The primary locations investigated consisted of five areas on site:

- o Along the side of Building 3 closest to the river.
- o The raceway area from where it comes out from under the buildings to its outfall.
- o Two areas where drummed raw materials and hazardous waste had been stored historically.
- o The banking of the trench that extends from the outfall to its confluence with the East Branch of the Neponset River.

The vadose zone sampling locations were approved by SEA both before and during the field work. They are shown on Figures 2 and 3. SEA visited the site several times to observe the fieldwork.

The hazardous wastes that are stored on site and collected periodically by a waste hauler consist of waste solvent, oil, paint, carbon black solution, and epoxy resin waste. These wastes are stored inside the building near the loading area off Walpole Street.

At each location specified, a hand-driven plunger bar was used to make a small (1/2-inch to 3/4-inch) borehole, after first drilling through any asphalt or concrete, using an electric



rotary drill equipped with a 3/4-inch drill bit. The total depth of the borehole was approximately 2.5 to 3 feet below the surface. A decontaminated 1/2-inch diameter stainless steel soil vapor sampler was lowered into the borehole in such a manner that the top of the sampler formed an air-tight seal with the entrance to the borehole.

The sampler was cleaned prior to use by washing the outside of it with soapy water, then rinsing it successively with tap water, methanol, then tap water again. If a seal could not be made due to asphalt at the surface, a piece plastic was used to make an air-tight seal. The vapor sampler consists of a capped, perforated, stainless steel tube equipped with a tubing adapter at the top to allow its connection with an air pump that will purge the sealed borehole and a septum to allow sampling of the soil vapor. Each soil gas sample was taken through the septum, using a gas-tight syringe after 5 minutes of purging the sealed borehole. The syringe needle tip was pushed into a rubber stopper while being transported to the gas chromatograph, usually less than a 5-minute walk.

The Photovac Model 10S50 portable gas chromatograph (GC) with a 4-foot long SE-30 column was set up in a testing laboratory within the facility. The GC was calibrated using measured aliquots of the headspace above aqueous standards of methylene chloride, trichloroethylene (TCE), 1,1,1-trichloroethane (1,1,1-TCA), 1,1,-dichloroethane (1,1-DCA), and toluene. Fresh field standards were prepared daily. After calibration, prior to sample injection, and after every 2 to 3 samples, a sample of ambient air was injected to obtain a measurement of background volatile compounds.

When the operating temperature of the Photovac 10S50 GC changed by more than 2°C, the GC was recalibrated using the standards.

H&A also added two vadose zone locations above the boundary of the site with Walpole Street directly across the street from Flashing Barricades, Inc.

#### Vadose Zone Screening Results

The resulting data from the vadose zone screening were calculated and are presented in Table I and Figures 2 and 3. The concentrations presented are relative to an aqueous standard and do not represent concentrations in the soil vadose zone. They also are approximate and are only intended for use



to screen the site for relative amounts of volatile compounds. Therefore, the concentrations of the compounds of interest detected in each sample were summed, then classified as follows:

#### Classification Concentration Range (ppb)

Low 1 to less than 10 Medium 10 to less than 50 High 50 or greater

The identifications are also considered tentative because retention times for standards were obtained using only the SE-30 column. If a compound other than one of the standard compounds was in a sample with a retention time similar to the standard, it would be incorrectly identified as that compound.

The data, as tabulated in Table I, indicate that the screening procedure identified methylene chloride as the most prevalent compound of the five screened for on the site. It occurred at low and medium concentrations at 10 of the 45 locations and possibly at a high concentration at one location. Trichloroethene and 1,1,1-trichloroethane were the only other compounds detected in this study. Their concentrations were found to be less than 5 ppb as shown in Table I.

The distribution of tentatively identified VOCs is shown in Figures 2 and 3. The figures indicate VOCs were detected at low concentrations at both locations within the diked drum storage area and at four of the six sampling points located between the northern fence and the concrete storm water drainage pipe. In addition, a high concentration of VOCs was detected at sampling point \$29 which is located near the outfall in the wooded section of the site.

Two sampling points (#8 and 12) were located in an area disturbed by demolition and construction activities. The presence of identifiable VOCs at these two locations is probably due to the incorporation in the soil of slightly contaminated material from inside the demolished building during demolition activities.

Other unidentified compounds were detected in the vadose zone samples. One compound was particularly prevalent on site. The shape of its peak was very characteristic: a long, broad asymmetrical peak with a steep face and long tail. Small peaks eluting prior to the VOCs of interest were also very common.



They probably represent common aliphatic hydrocarbons such as non-chlorinated ethanes that are by-products of biological degradation.

#### Monitoring Well Installation

An observation well (B1-OW) was hand-driven by H&A on 14 December 1987. This well is located about three feet north of vadose zone sampling point #29 where a high concentration of VOCs were detected. Details of the well construction and installation are shown on the Groundwater Observation Well Report in Appendix B. After installation, the equilibrated water level was 0.6 feet below ground surface. Before sampling, about twenty-eight volumes of water standing in the well were removed to develop and purge the well.

#### Sampling and Chemical Analysis

Under the agreement between W.R. Grace and DEQE, two surface water samples were collected: one upstream of the falls (SW-1) and one immediately downstream of the confluence of the river and the mill race (SW-2).

In addition to these samples that were requested by DEQE, one groundwater sample and three quality assurance/quality control (QA/QC) samples were collected. A duplicate sample of SW-2 (labelled SW-3) and a trip blank (SW-4) were obtained at the same time as the above samples.

A groundwater sample was collected from B1-OW immediately after it was installed, developed, and purged on 14 December 1987. A trip blank labelled B2-OW was also obtained and kept with the groundwater sample until they were delivered to the laboratory.

The water samples were all analyzed by EPA Method 624 at Clean Harbors, Inc., a DEQE-certified laboratory, in Braintree, Massachusetts. All the analyses indicate no volatile organic compounds on the Hazardous Substance List were detected in any of the samples. This list includes the compounds of concern at the site.

Appendix C of this report contains the Sampling Records that describe the sampling methods, the Chain-of-Custody Records, and the chemical analysis reports from the laboratory.



#### Discussion

The data from this study indicate that methylene chloride was tentatively identified at low concentrations (less than 10 ppb) in the air within the vadose zone in the diked drum storage area and at low to medium concentrations along the storm water drainage pipe that parallels the northern boundary of the site. No significant concentrations of five selected VOCs were detected in the following areas: along the side of Building #3 closest to the river, the former drum storage area for waste material, and along the mill race in the wooded section of the site except at one location(sampling location #29).

At vadose zone sampling location \$29, a high concentration of one or more VOCs was detected. The chromatogram shows a well-defined peak with a slight shoulder on a long tail. Interpretation of this chromatogram was difficult because when high concentrations of VOCs are run through the SE-30 column broader chromatogram peaks and long tails are produced. Small quantities of methylene chloride produced sharp symmetrical peaks on chromatograms resulting in retention times reproducible within 2 to 3 seconds of the standard retention time as selected by the GC. Since the GC establishes a retention time electronically, there is more variation in the selection of a retention time for peaks with broader points. Therefore, a 5.4-second difference between a sharp methylene chloride standard peak and the broad peak on the chromatogram for location \$29 is small enough to identify the compound as methylene chloride using this analysis method.

We interpret the chromatogram as follows: the vadose zone sample contained a high concentration of a VOC tentatively identified as methylene chloride. Another VOC, represented by the shoulder on the peak, is present at significant but unknown concentrations. A useful estimate of the methylene chloride concentration cannot be made because it is well above the range of the standards used during the field investigation.

Since the groundwater from the well (B1-OW), about three feet from vadose zone sampling location #29, had no detectable methylene chloride nor any other identifiable VOC, we believe that the detection of methylene chloride at location #29 may have resulted from an incorrect identification or that a small, very localized release of methylene chloride occurred which was only detected in the vadose zone.

Since no VOCs were detected above the falls on the river and at the confluence of the mill race and river, we conclude that the



low concentrations of a compound tentatively identified as methylene chloride detected in the vadose zone on site are not contaminating the East Branch of the Neponset River.

#### Conclusions

Haley & Aldrich has conducted vadose zone screening and water sampling in selected areas of the Emerson and Cuming Walpole Street site in Canton, Massachusetts. The study focused on five volatile organic compounds that have been detected in Canton's municipal well # 7, which is located about 800 feet from the western end of the site on the opposite side of the East Branch of the Neponset River. In addition to the vadose zone screening, surface water samples from the East Branch and a groundwater sample were obtained and chemically analyzed.

#### These data indicate the following:

- o Methylene chloride was tentatively identified as being present at low and medium screening concentrations in the former diked area for drummed raw materials and in the area of the storm water drainage pipe where it parallels the northern boundary of the site. The other four volatile organic compounds were not detected at significant concentrations in these two areas.
- o The five volatile organic compounds were not detected at significant concentrations in the following areas with the exception of sampling location #29: along the side of Building #3 closest to the river, the former drum storage area for waste materials, along the boundary of the property opposite Flashing Barricades, Inc., and along the mill race in the wooded section of the site.
- o No Hazardous Substance List volatile organic compounds (which include methylene chloride) were detected in the groundwater in the immediate vicinity of location #29 where a high concentration of possibly methylene chloride was detected. The major volatile organic compound detected at this location was either identified incorrectly or is present only in the vadose zone and is not affecting the groundwater quality.
- o The methylene chloride tentatively identified as being present on site is not contaminating the East Branch of the Neponset River.



#### **Limitations**

This letter has been prepared for the exclusive use of W. R. Grace & Co. in connection with a site in Canton, Massachusetts.

The conclusions provided by Haley & Aldrich, Inc. are based solely on the scope of work conducted and the sources of information referenced in this report. Any additional information that becomes available concerning this site should be provided to Haley & Aldrich, Inc. so that our conclusions and recommendations may be revised and modified as necessary.

The work performed by Haley & Aldrich, Inc. is subject to the terms and conditions stated in our proposal to W. R. Grace & Co. dated 19 October 1987. This work has been undertaken in accordance with generally accepted hydrogeological practices. No other warranty, express or implied, is made.

Thank you for inviting us to undertake this project. Please do not hesitate to contact us, should you have any questions or require any additional information concerning this project.

Sincerely yours,

HALEY & ALDRICH, INC.

Stanley J. Fielding Senior Scientist

Wesley E. Stimpson Vice President

SJF:WES:rec/0147R

Enclosures:

Table I - Vadose Zone Screening Results
Table II - Previous Chemical Analysis Data

Figure 1 - Project Locus

Figure 2 - Site and Subsurface Exploration Location

Plan - Manufacturing Area

Figure 3 - Site and Subsurface Exploration Location
Plan - Wooded Area

Appendix A - Groundwater Observation Well Report

Appendix B - Sampling Records, Chain of Custody Records, and Chemical Analysis Reports



TABLE 1 VADOSE ZONE SCREENING RESULTS

			<u> </u>	poroximate Co	ncentrations (ppb	)'
Sample	Concentration Level ²	Methylene	Trichloro-		ncentrations (ppb 1,1-Dichloro-	1,1,1-Trichloro-
ocation	Level	Chloride	ethene	Toluene	ethane	ethane
	₩03	.3				
1	MD-2	••	•	•	•	•
2	NO	•	•	•	•	•
3	ND		•	•	•	•
4	ND	•	•	•	•	•
5	MO	•	•	•	•	•
6	NO X	•	•	•.	•	•
7	Low	2.5	••	•	•	•
8	Low	5.0	3.0	•	•	• '
9	ND	•	•	•	•	•
10	MD	•	•	•	•	•
11	MO _	•	•	•	•	•
12	Medium ^S	41	•	•	•	1.2
13	MO	•	•	•	•	•
14	MO	•	•	•	•	•
15	ND	•	•	•	•	•
16	WD	•	•	•	• <del>-</del> '	•
17	Low	7.4	•	•	•	•
18	LON	1.0	•	•	• .	•
19	NO	•	•	•	• ,	•
20	MÔ	•	•	-	•	•
21	Medium	23	•	•	•	•
22	Low	2.6	•	•	•	•
23	Low	2.0	•	•	•	•
23 24	·· ND	•	•	•	•	•
25	Low	2.2	•	•	•	•
26	NO	•	•	•	•	•
27	ND	•	•	•	•	•
28	NO.	•	•	•	•	
29	NO +6	*6	•		•	
30	NO				•	•
31	Low	1.2	•			
32	ND	• • •				· •
33	NO	•	•	•		
33 74	NO	_	_		-	_
34 76	NO NO	-	_	_	-	_
34 35 36	ND ND	-	_	_	•	
36 37	Low	_	4.0			•
37 38	NO .		•.0	-		•
39		_		_	· ·	<u>-</u>
59 40	ND	-	-	-	•	•
	ND	•	•	<u>.</u>	•	•
41	ND	•	•	•	•	•
42	ND	•	•			• • • • • • • • • • • • • • • • • • • •
43	ND	•	•	•	•	•
44	ND	•	•	•	•	•
45	ND	•	•	•	•	•

- Notes:

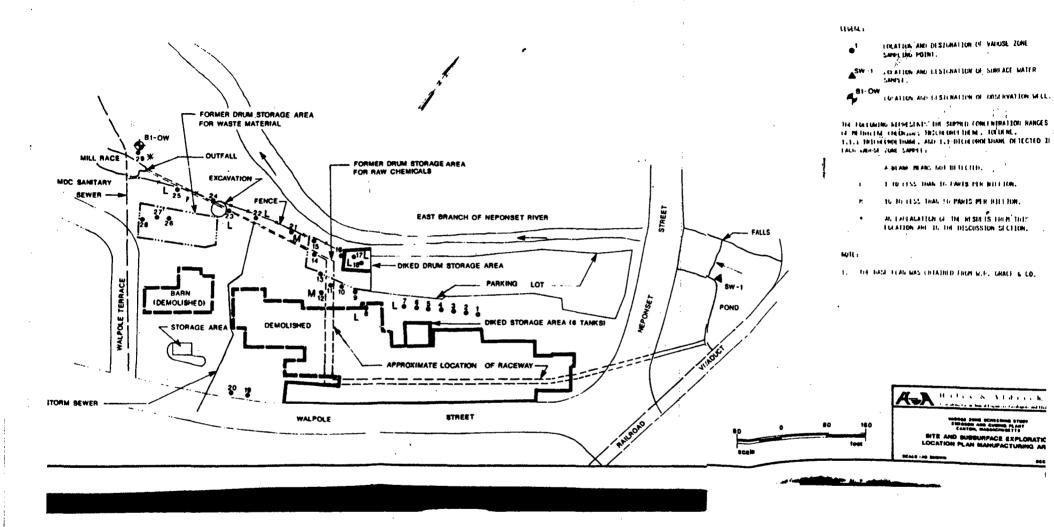
  1. The concentrations are in micrograms of a compound per liter of water. The quantity of a compound detected in the soil gas was compared to the retention time and the concentration in the air over a known concentration of a standard compound in water.
- 2. The concentration level is more appropriate when discussing concentrations because the numerical concentrations are very approximate.
- 3. Not Detected.
- 4. Concentrations range from 1 to less than 10 ppb.
- 5. Concentrations range from 10 to less than 50 ppb.
- 6. Results of this sample are discussed in the discussion section of the text.

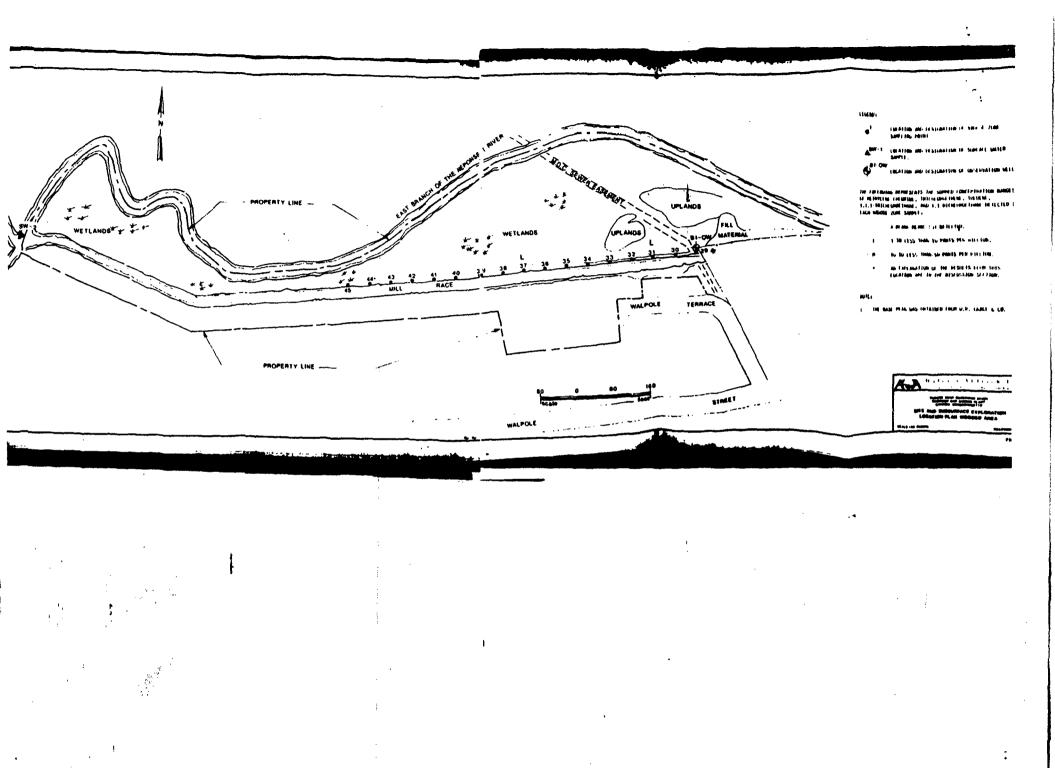
TABLE II
PREVIOUS CHEMICAL ANALYSIS DATA

Sample Location Sampling Date	A ¹ 6/1/84	A 7/11/84	B ² 6/1/84	B 7/11/84	C ³ 7/11/84
Compound ⁴					
Methylene chloride 1,1,1-Trichlorethane Toluene 1,1-Dichlorethane	_3 - -	4.2 - NA ⁶	21	10.1 - NA	- - NA

#### NOTES!

- 1. Sampled at non-contact cooling water and groundwater collection sump.
- 2. Sampled at the outfall where the raceway discharges to the mill race.
- 3. Sampled from pond above the falls on the river.
- 4. The concentrations are in micrograms per liter which is approximately equivalent to parts per billion.
- 5. Not detected.
- 6. Not analyzed for.





### APPENDIX A GROUNDWATER OBSERVATION WELL REPORT

HALEY & ALDRICH, INC. CONSULTING SOIL ENGINEERS	GROUND WATER OBSERV	ATION WELL REPORT					
PROJECT: VADOSE ZON	E SCREENING STUDY	FILE NO. 6500-00					
LOCATION:EMERSON &	CUMING, CANTON, MASSACHUSETTS						
CLIENT: W.R. GRACE	IENT: W.R. GRACE & COMPANY						
CONTRACTOR: NONE		LOCATION 3 ft. North					
	HEA REP: ROB MCGRATH	Sampling Pt. #29					
INSTALLATION DATE		SHEET 1 OF 1					
SURVEY DATUM  GROUND ELEVATION  Note: This well was hand-driven by H&A. riser pipe was const cted of galvanized s Before installation,	The Control of Stickurs and Type of Surface Sea Chickness and Type of Surface Sea Chickness and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type Stickurs and Type S	P ABOVE/BELOW CASING OR ROAD- IP ABOVE/BELOW RISER PIPE.  E SEAL None HOWING DEPTH,					
the well materials we rinsed with hexane, washed with soapy washed rinsed successi with tap water, methand distilled water.	ter, 5 TYPE OF CASING vely anol,	BOTTOM OF  ISER PIPE  1.25 in.  ROUND RISER  None					
SUMMARIZE SOIL CONDITIO	TYPE OF BACKFILL AR	Johnson Wrapped-NuFACTURER Stainless Steel E OF OPENINGS 0.010 in.  1.25 in.  ROUND POINT None					
	ELEVATION/DEPTH OF	***					
	FIGURES REFER TO: E	LDEPTH_X_]					
None ]	5 ft. + 2 ft.	= 7 ft.					
LENGTH OF CASING L1	ENGTH OF RISER PIPE (L1) LENGTH	OF POINT (L2) LENG					

#### APPENDIX B

SAMPLING RECORDS, CHAIN OF CUSTODY RECORDS, AND CHEMICAL ANALYSIS REPORTS

FILE NO PROJECT CLIENT LOCATION SAMPLING DATE _ FIELD PERSONN	MATEN WE GEN NEPONOXI U Dec	1 0 0 (E Biver B 7 WM	0 0	ADDRESS	Lean Hai Wood Inter Aux S 4 Dec 1	hultheis	OF/
Sunny Partly Cloudy O arcart Reserv Clouds Sain Light Steet Reavy	Ory Slightly Hu Moderatily Yary Humid	Homid I	Steady Variable	Moderate to Heavy	Dry Damp Yes Comments:	Standing Snow: Other:	
H&A	LOCATION	DEPTH	TIME	JRFACE WATER SAMPLING INF	SAMPLING	CLEANING	CONTAIN
SW-Z	Above Sea falls plan below confluence mench i Nor	-	1430	River water clear	DEVICE  direct  into  bottle	N/A	TYPE VOA Vanl
5w-3	Duplice	te of	5W	-2			
Sw-Y	Trip	6 km lk					

STDM = Wash with scapy water, rinse with tap water, distilled water and methanol.

10...-

HEA MALEY	ALDRICK INC.	С	HAIN		<u>_</u>				RE	C	OF	RE	)			PAGE / OF )
HAA FILE NO. 3		000			16 M	AK	100	ध्य				-1	DELIVER	Y DA	TE _	4 DEC 07
	ANNER	~ 1 6 d			ALEX SC	14°	2 <u>P</u>	700	18	- 1 -	<u> </u>	-	DATE FI	NAL	REPO	NT DUE 16 DEC 87
H & A CONTACT	7,000	<del>acuce</del>	CON1	AC1	, , , , , , , , , , , , , , , , , , ,			-7-			==		PRUJEG	HA	_	
		SAMP	LING					2		₽ NAL	YSES	<u>-</u>			AINERS	COMMENTS
HEA SAMPLE NO.	LABORATORY SAMPLE NO.	DATE	TIME	DEPTH	SAMPLE TYPE	<b>V0</b>	ABN	METALS	PEST/PCB	PET.	0				CONT	(Special instructions, cautions, etc.)
SW-1	•	4 Dec E7	1200	-	500	X									Z	
5W-2		4 Dec 87	1434		5W	×									Z	
SW-3		4 Dec ex	1500	-	SW	X								,	Z	
5W-4		4 Dec Est	15.5	_	500	×									2	
																3
		·														
	·															
Sign Webs W.  Sign Webs W.  Print Echoff W. M  Birm type & the  II. Reinquising by	M8 #	Sign COA	Impalgu	E	Idly AOV	X										REMARKS: (Sample storage,
Sign Wolf W.	Mesian	Print DA F	m latar	te	Class Bottle										٥	nonstandard sample bottles)
Firm Holly a the	lich	Fire Clan	Harburs		PlasticBottle										<u>-</u>	4.714
II. Resinquished by	lee	Date 12-4-5		:05 p.77	Preser -	K			1						D D	VOA 624
Sign		Sign		,	vative	<b>'</b> '						{			-	
Print		Prest			Container	46									-	
Firm Date	ries †	Firm	Time		Volume	*										·
Evidence Samples		Date Yes			IdiV ADV											
If Yes, explain in	.*	7	•		Glass Jar										٥	
	N.R. GRAC	<del></del>			Plastic Jar										-	
			<del></del>	<del></del>	Preser -		$\neg$		$\neg$		T	$\neg$			اد	
Address:	<del></del>				vative										0	•
Client contact: _ Telephone no.: _					Container Volume		Ī								~	
•			•		Note: Sampl	e b	ttle	Sur	plie	d by	اعل	. w	nless in	dica:		1
	•				PRESERVAT	ION	KE'	Y: /	۸	Samo	ie c	hille			-	1
					8 - Filtered D - NaOH,	ı. C	- A	cidif	led :	with					-1	,



325 WOOD ROAD, BRAINTREE, MA 02184 (617) 849-6070

#### REPORT OF ANALYSIS

Job Identification: Canton					
Water Samples					
Date Received: 12/4/87					
CHAS Lab #: 8712042-01 to 04					
P.O. #: 56 6500 00					

Enclosed are the results for the sample(s) delivered to our laboratory on the date indicated above.

Should you have any questions concerning this work, please do not hesitate to contact me.

This laboratory follows quality assurance/quality control procedures outlined in EPA Publication EPA 600/4-79-019, "Handbook for Analytical Quality Control in Water and Wastewater Laboratories," March 1979, and specific QA/QC requirements of the procedures used.

The information contained in this report is, to the best of my knowledge, accurate and complete.

Per/Date:

Alex Schultheis Laboratory Director



Client: Haley & Aldrich, Inc.
Sample Station: SW-1 Water Sample

CHAS Lab #: 8712042-01 Date Received: 12/04/87

#### Volatile Organic Analysis by EPA Method 624

Analysis Date: 12/07/87

Compound	MDL*	Conc.*	* Compound		Conc.*
Chloromethane	10	ND	cis-1,3-Dichloropropene	5	ND
Bromomethane -	10	ND	Trichloroethene	5	ND
Vinyl Chloride	10	ND	Benzene	5	ND
Chloroethane	10	ND	Dibromochloromethane	5	ИД
Methylene Chloride	5	ND	1,1,2-Trichloroethane	5	ИD
Trichlorofluoromethane	5	ND	trans-1,3-Dichloropropene	5	ND
1,1-Dichloroethene	5	ND	2-Chloroethylvinyl Ether	10	ND
1,1-Dichloroethane	5	ND	Bromoform	5 ·	ND
trans-1,2-Dichloroethene	5	ND	1,1,2,2-Tetrachloroethane	5	ND
Chloroform	5	ND	Tetrachloroethene	5	ND
1,2-Dichloroethane	5	ND	Toluene	5	ND
1,1,1-Trichloroethane	5	ND	Chlorobenzene	5	ND
Carbon Tetrachloride	5	ND	Ethylbenzene	5	ND
Bromodichloromethane	5	ND	Total Xylenes	5	ND
1,2-Dichloropropane	5	ND	•		
• •			Acetone	20	ND
			Carbon Disulfide	10	ND
			2-Butanone	20	ND
		:	Vinyl Acetate	10	ND
		•	4-Methyl-2-Pentanone	5	ND
			2-Hexanone	5	NĐ
		and the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second o	Styrene	5	ND

QA/QC Surrogate Recoveries:

1,2-Dichloroethane: 82%

D-8 Toluene: 101%

p-BFB: 87%

Notes: ND - Below minimum detectable level (MDL)

* - ug/1



Client: Haley & Aldrich, Inc. Sample Station: SW-2 Water Sample CHAS Lab #: 8712042-02 Date Received: 12/04/87

#### Volatile Organic Analysis by EPA Method 624

Analysis Date: 12/07/87

Compound	MDL*	Conc.*	Compound	MDL*	Conc.*
Chloromethane	10	ND	cis-1,3-Dichloropropene	5	ND
Bromomethane	10	ND	Trichloroethene	5	ND
Vinyl Chloride	10	ND	Benzene	5	ND
Chloroethane	10	ND	Dibromochloromethane	5	ND
Methylene Chloride	5	ND	1,1,2-Trichloroethane	5	ND
Trichlorofluoromethane	5	ND	trans-1,3-Dichloropropene	5	ND
1,1-Dichloroethene	5	ND	2-Chloroethylvinyl Ether	10	ND
1,1-Dichloroethane	5	ND	Bromoform	5	ND
trans-1,2-Dichloroethene	5	ND	1,1,2,2-Tetrachloroethane	5	ND
Chloroform	5	ND	Tetrachloroethene	5	ND
1,2-Dichloroethane	5	ND	Toluene	5	ND
1,1,1-Trichloroethane	5	ND .	Chlorobenzene	5	ND
Carbon Tetrachloride	5	ND	Ethylbenzene	5	ND
Bromodichloromethane	5	ND	Total Xylenes	5	ND
1,2-Dichloropropane	5	ND	·		
			Acetone	20	ND
			Carbon Disulfide	10	ND
			2-Butanone	- 20	ND
•			Vinyl Acetate	10	ND
			4-Methyl-2-Pentanone	5	ND
			2-Hexanone	5	ND
			Styrene	5	ND

QA/QC Surrogate Recoveries:

1,2-Dichloroethane: 90%

D-8 Toluene: 103%

p-BFB: 90%

Notes: ND - Below minimum detectable level (MDL)

* = ug/1



Client: Haley & Aldrich, Inc. Sample Station: SW-3 Water Sample CHAS Lab #: 8712042-03
Date Received: 12/04/87

### Volatile Organic Analysis by EPA Method 624

Analysis Date: 12/07/87

Compound	MDL*	MDL* Conc.* Compound		MDL*	Conc.*
Chloromethane	10	ND	cis-1,3-Dichloropropene	5	ND
Bromomethane	10	ND	Trichloroethene	5	ND
Vinyl Chloride	10	ND	Benzene	5	ND
Chloroethane	10	ND	Dibromochloromethane	5	ND
Methylene Chloride	5	ND '	1,1,2-Trichloroethane	5	ND
Trichlorofluoromethane	5	ND	trans-1,3-Dichloropropene	5	ИD
1,1-Dichloroethene	5	ND	2-Chloroethylvinyl Ether	10	ND
1,1-Dichloroethane	5	ND	Bromoform	5	ND
trans-1,2-Dichloroethene	5	ИD	1,1,2,2-Tetrachloroethane	5	ND
Chloroform	5	ND	Tetrachloroethene	5	ND
1,2-Dichloroethane	5	ND	Toluene	5	ND
1,1,1-Trichloroethane	5	ИD	Chlorobenzene	5	ND
Carbon Tetrachloride	5	ND	Ethylbenzene	5	ND
Bromodichloromethane	5	ND	Total Xylenes	5	ND
1,2-Dichloropropane	5	ND			
			Acetone	20	ND
		•	Carbon Disulfide	10	ND
			2-Butanone	20	ND
			Vinyl Acetate	10	ND
			4-Methyl-2-Pentanone	5	ND
			2-Hexanone	5	ND
			Styrene	5	ND

QA/QC Surrogate Recoveries:

1,2-Dichloroethane: 81%

D-8 Toluene: 104%

p-BFB: 89%

Notes: ND = Below minimum detectable level (MDL)

* = ug/1



Client: Haley & Aldrich, Inc.
Sample Station: SW-4 Water Sample

CHAS Lab #: 8712042-04 Date Received: 12/04/87

### Volatile Organic Analysis by EPA Method 624

Analysis Date: 12/07/87

Compound	MDL*	Conc.*	Compound	MDL*	Conc.*
Chloromethane	10	ND	cis-1,3-Dichloropropene	5	ND
Bromomethane	10	ND	Trichloroethene	5	ND
Vinyl Chloride	10	ND	Benzene	5	ИD
Chloroethane	- 10	ND	Dibromochloromethane	5	ND
Methylene Chloride	· 5	ND	1,1,2-Trichloroethane	5	ND
Trichlorofluoromethane	5	ND	trans-1,3-Dichloropropene	5	ND
1,1-Dichloroethene	5	ИD	2-Chloroethylvinyl Ether	10	ND
1,1-Dichloroethane	5	ND	Bromoform	5	ND
trans-1,2-Dichloroethene	5	ND	1,1,2,2-Tetrachloroethane	5	ND
Chloroform	5	ND	Tetrachloroethene	5	ND
1,2-Dichloroethane	5	ИD	Toluene	5	ND
1,1,1-Trichloroethane	5	ND	Chlorobenzene	5	ND
Carbon Tetrachloride	5	ND	Ethylbenzene	5	ND
Bromodichloromethane	5	ND	Total Xylenes	5	ND
1,2-Dichloropropane	5	ND			
			Acetone	20	ND
			Carbon Disulfide	10	ND
			2-Butanone	20	ND
			Vinyl Acetate	10	ND
			4-Methy1-2-Pentanone	5	ИD
			2-Hexanone	5	ND
			Styrene	5	ND

QA/QC Surrogate Recoveries:

1,2-Dichloroethane: 81%

D-8 Toluene: 104%

p-BFB: 90%

Notes: ND - Below minimum detectable level (MDL)

 $\star \sim ug/1$ 

AND MALE	& ALDRICH INC.	,	SAMF	PLING RECOR		SR #: PAGE /	/ OF /
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SAMPLE NO.	LOCATION	DEPTH	TIME	SAMPLE DESCRIPTION	SAMPLING DEVICE	CLEANING PROCEDURE	CONTAIN TYPE
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FILE 110. 6500	CLIENT	Emerson	& Cump	11085		SAMPLING	DATE /4	Dec 87
-	GRO	UNDWATER	SAMPLING	SINF	DRMATION			
WELL NO.	BI-OW							
WATER DEPTH (GS)	0.6ft							
TIME	1315							
PRODUCT	NO							
DEPTH OF WELL (GS)	60ft							
STANDING WATER DEPTH	54ft							
WELL I.D.	\$20m/-25	,						
VOLUME OF WATER IN WELL	0.046 43							
PURGING DEVICE	teston banker							
VOLUME OF BAILER/ PUMP CAPACITY	0.00882#				- '			
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### REPORT OF ANALYSIS

Haley & Aldrich, Inc.	Job Identification: Canton					
238 Main Street Cambridge, MA 02142	Water Sample					
- مغیب	Date Received: 12/14/87					
Attn: Ms. Anne Zoeller	CHAS Lab #: 8712138					
	P.O. #: 566500	_				

Enclosed are the results for the sample(s) delivered to our laboratory on the date indicated above.

Should you have any questions concerning this work, please do not hesitate to contact me.

This laboratory follows quality assurance/quality control procedures outlined in EPA Publication EPA 600/4-79-019, "Handbook for Analytical Quality Control in Water and Wastewater Laboratories, " March 1979, and specific QA/QC requirements of the procedures used.

> The information contained in this report is, to the best of my knowledge, accurate and complete.

Alex Schultheis

Laboratory Director

1987

TO THE ALLEGE, M.C.



Client: Haley & Aldrich, Inc.

CHAS Lab #: 8712138-01 Date Received: 12/14/87 Sample Station: B1-OW Water Sample

### Volatile Organic Analysis by EPA Method 624

Analysis Date: 12/15/87

Compound	MDL*	Conc.*	Compound	MDL*	Conc.*
Chloromethane	10	ND	cis-1,3-Dichloropropene	5	ND
Bromomethane	10	ND	Trichloroethene	5	ND
Vinyl Chloride	10	ND	Benzene	5	ND
Chloroethane	10	ND	Dibromochloromethane	5	ND
Methylene Chloride	5	ND	1,1,2-Trichloroethane	5	ND
Trichlorofluoromethane	5	ND	trans-1,3-Dichloropropene	5	ND
1,1-Dichloroethene	5	ND	2-Chloroethylvinyl Ether	10	ND
1,1-Dichloroethane	5	ND	Bromoform	5	ND
trans-1,2-Dichloroethene	5	ND	1,1,2,2-Tetrachloroethane	5	ND
Chloroform	5	ND	Tetrachloroethene	5	ND
1,2-Dichloroethane	5	ND	Toluene	5	ND
1,1,1-Trichloroethane	5	ND	Chlorobenzene	5	ND
Carbon Tetrachloride	5	ND	Ethylbenzene	5	ND
Bromodichloromethane	5	ИD	Total Xylenes	5	ИD
1,2-Dichloropropane	5	ND			
			Acetone	20	ND
			Carbon Disulfide	10	ND .
•			2-Butanone	20	ND
			Vinyl Acetate	10	ND
			4-Methyl-2-Pentanone	5	ND
			2-Hexanone	5	ND
4			Styrene	5	ND

QA/QC Surrogate Recoveries:

1,2-Dichloroethane: 94%

D-8 Toluene: 98%

p-BFB: 99%

Notes: ND - Below minimum detectable level (MDL)

 $\star - ug/l$ 



Client: Haley & Aldrich, Inc.

Sample Station: B2-OW Water Sample

CHAS Lab #: 8712138-02 Date Received: 12/14/87

### Volatile Organic Analysis by EPA Method 624

Analysis Date: 12/15/87

Compound	MDL*	Conc.*	Compound	MDL*	Conc.*
Chloromethane	10	ND	cis-1,3-Dichloropropene	5	ND
Bromomethane	10	ND	Trichloroethene	5	ND
Vinyl Chloride	10	ND	Benzene	5	ND
Chloroethane	10	ND	Dibromochloromethane	5	ND
Methylene Chloride	·5	ND	1,1,2-Trichloroethane	5	ND
Trichlorofluoromethane	5	ND	trans-1,3-Dichloropropene	5	ND
1,1-Dichloroethene	5	ND	2-Chloroethylvinyl Ether	10	ND
1,1-Dichloroethane	5	ND	Bromoform	5	ND
trans-1,2-Dichloroethene	5	ND	1,1,2,2-Tetrachloroethane	5	ND
Chloroform	5	ND	Tetrachloroethene	5	ND
1,2-Dichloroethane	5	ND	Toluene	5	ND
1,1,1-Trichloroethane	5	ND	Chlorobenzene	5	ND
Carbon Tetrachloride	5	ND	Ethylbenzene	5	ND
Bromodichloromethane	5	ND	Total Xylenes	5	ND
1,2-Dichloropropane	5	ND			
			Acetone	20	ND
			Carbon Disulfide	10	ND
			2-Butanone	20	ND
			Vinyl Acetate	10	ND
•			4-Methyl-2-Pentanone	5	ND
			2-Hexanone	5	ND
		•	Styrene	5	ND

QA/QC Surrogate Recoveries:

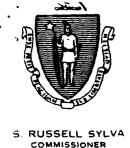
1,2-Dichloroethane: 94%

D-8 Toluene: 98%

p-BFB: 102%

Notes: ND - Below minimum detectable level (MDL)

* = ug/1



# The Commonwealth of Massachusells Executive Office of Environmental Affairs Department of Environmental Quality Engineering Division of Water Supply One Winter Street, Boston, Mass. 02108

October 1, 1987

Mr. James F. Murphy, Jr. Assistant Vice President Polyfibron Division W. R. Grace & Company 55 Hayden Avenue Lexington, MA 02173

RE: Emerson & Cuming
59 Walpole Street
Canton, Massachusetts
Site Investigations
Upper Neponset Valley Aquifer

Dear Mr. Murphy:

As you are aware, S E A Consultants, Inc. is presently acting as a contractor for the Department of Environmental Quality Engineering, Division of Water Supply, in a groundwater investigation of the Upper Neponset Valley Aquifer in the Towns of Dedham, Canton, Westwood, and Norwood.

A short time ago, S E A conducted a site inspection of your property. As a result of that site inspection, S E A recently requested your permission for access to your property in order to perform further site-specific studies. This work includes an analysis of the near surface soil gas environment via soil gas analysis, surface water sampling, and other activities. The scope of the analysis requested is described in detail in the attached work plan.

Pine and Swallow Associates, as subconsultants to S E A for this investigation, were originally to perform this on-site work. However, because W. R. Grace & Co. and Emerson and Cuming objected to Pine & Swallow performing this work and in the interest of time, the DEQE is willing to allow Emerson & Cuming to utilize its own consultant to perform on-site investigations provided certain specific conditions are met.

These conditions are as follows:

The work must be performed by a contractor and individuals with appropriate previous experience in soil gas analysis and supervision of field hydrogeological contamination investigations. Resumes and qualifications of the firm and individuals must be submitted to Roy Crystal of DEQE prior to initiating work and approved in advance. Letter to James F. Murphy, Jr. October 1, 1987
Page 2

- 2) A written report documenting the methodology and results of the work (Tasks 1-6) shall be prepared and submitted to the DEQE on or before October 30, 1987.
- 3) Work shall be performed in accordance with the procedures and activities defined in the attached Work Plan. Any changes or deviations shall be approved in advance by the Department.
- Provision is made for on-site review of the conduct of the work by S E A as the Department's representative or inspection by Department employees at any time while the work is being conducted.
- 5) Field results of the soil gas analysis will be made immediately available to S E A and DEQE as the investigation proceeds.
- Permission is granted to DEQE's drilling subcontractor, Engineering Management Systems, to install monitoring wells on the property at locations to be determined based on the results of the soil gas analysis. A work plan for monitor well installation will be submitted for review and comment by W. R. Grace and Emerson & Cuming prior to initiation of work. If necessary to meet the project schedule, monitor well installation may be initiated prior to receipt of the written report by Grace's consultant.
- A written response indicating your consent to these conditions is received on or before October 8, 1987.

Please convey your response to Roy Crystal, Neponset Project Coordinator, DEQE Division of Water Supply, One Winter Street, 10th Floor, Boston, MA 02108 (617) 292-5859.

Patricia L. Desse, Director Division of Water Supply

PLD/ecw Enclosure

cc: D. R. Bowley, Boston Steve Johnson, DHW. Woburn

### **WORK PLAN**

#### **FOR**

#### EMERSON & CUMING INC.

### 59 Walpole Street

### Canton, Massachusetts

- Task 1. The primary on-site areas to be investigated will be on or in the vicinity of the following localities:
  - a. Building No. 3 as noted in Camp, Dresser and McKee's 1983 "Spill Control Audit at Plant No. 2."
  - b. The underground "raceway" which exists from beneath the on-site buildings and continues to the East Branch River.
  - c. The previous outside drum storage areas(s) of raw and waste chemicals as noted in Camp, Dresser and McKee's 1983 "Spill Control Audit at Plant No. 2.
- Task 2. Should the areas to be investigated be presently occupied by various equipment, storage articles, etc., EC will make every effort to move this material so that the area can be made accessible to the investigation.
- Task 3. Initial on-site work will consist of soil gas investigation in the areas specified in this Work Plan. The soil gas technique consists of the following:
  - a. At each location specified, small diameter (3/4-inch to 1-inch) boreholes shall be excavated by a hand or electrically-driven power auger to a depth of approximately two (2) feet below the

ground surface. The borehole shall be sealed at the ground surface with a cork or wooden stopper which forms a snug fit. Stoppers placed in boreholes augered through pavement shall have clay placed between the stopper and the borehole to form a better seal. The stopper shall have one vertical hole through which Teflon tubing will be fitted into the borehole. The Teflon tubing above the stopper will have a Teflon T-fitting from which a soil gas sample will be withdrawn with a gas-tight syringe. The balance of the tubing may consist of tygon or silicon tubing. A soil gas sample shall be withdrawn from this borehole after a minimum of one minute of pumping out the sealed borehole with a pump specifically designed for air pumping.

- b. After a soil gas sample is taken, it will be immediately injected into the Photovac 10S50 portable gas chromatograph (GC) and analyzed on-site for the presence of volatile organic chemicals (VOCs). Analysis will be done using the SE-30 column for detection, or equivalent. Should chromatogram peaks be evident from a sample run, an attempt will be made to identify any peaks by comparing the peaks with known standards placed within the same library memory of the Photovac 10S50 GC.
- c. Prior to initial site work, EC's consultant will have placed, at a minimum, the following chemical standards in air into the same library of the Photovac 10S50 GC. These include: methylene chloride, 1,1-dichloroethane, 1,1,1-trichloloethane, toluene, and trichloroethylene.
- d. Should the operating temperature of the Photovac 10S50 GC change significantly during on-site work, EC's consultant should be prepared to inject standards noted in Item 3c

under field operating conditions. Significant temperature changes may affect the elusion time of the contaminants detected in any sample and, therefore, the identification of the chemical when compared to the retention time of the library standard.

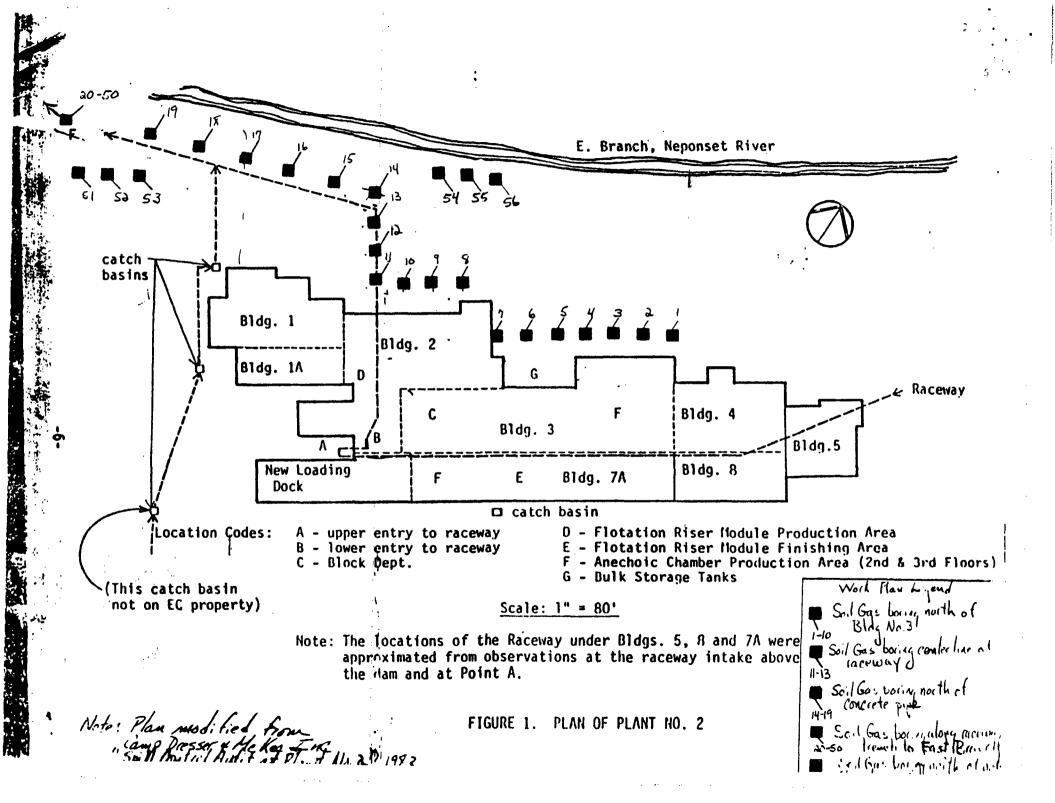
- Task 4. Soil gas samples will be taken at the specified horizontal spacing at the following locations as noted on Figure 1:
  - a. At 20 foot centers along an east-west line approximately 50 to 100 feet north of Building No. 3.
  - b. At 20 foot centers at the centerline of the underground raceway emanating from Building No. 2 to its connection to the 2 foot concrete pipe beneath the pavement north of Building No. 2.
  - c. At 20 foot centers north of the underground 2 foot diameter concrete pipe utilized as a portion of the raceway.
  - d. At 20 foot centers along the entire length of the "natural" surface trench acting as the raceway between the 2 foot diameter concrete pipe and the East Branch River.
  - e. At 20 foot centers immediately north of previous outside drum storage areas.
- Task 5 Collect a total of two surface water samples from the East Branch of the Neponset River for laboratory analysis at a Massachusetts state certified laboratory for VOCs by EPA method 624 and non-priority

pollutant hazardous waste list volatile compounds. The water samples will be collected at each of the following locations: from the East Branch east of Neponset Street and upstream of falls; from the East Branch immediately downstream of the location where it intersects the raceway from EC property.

Task 6. A written report documenting the methodology and results of the work will be submitted to the DEQE on or before October 30, 1987.

0453R

-4-





April 13, 1987

### **EMERSON** & CUMING

Emerson & Cuming, Inc. A GPACE CO Composite Materials

Canton, Massachusetts 02021-1816 Telephone (617) 821-4250

Mr. Edward Lukaszewicz Chairman Canton Conservation Commission P.O. Box 86 Canton, MA 02021

Dear Commission Member,

This letter is in response to the Enforcement Order issued by the Commission on March 24, 1987 to Emerson & Cuming, Inc. (E&C). As evidenced by E&C's past work with the Canbon Board of Health and the DEQE, we are always ready and willing to work cooperatively with the Town.

It is my hope that by addressing the substance of the Commission's concerns separate from the legal issues raised by the Enforcement Order, E&C long-standing interest in material handling issues will be demonstrated. Nonetheless, I must emphasize that our willingness to respond to the substance of the Commission's request for action is not intended as a waiver of any legal rights which E&C may have to contest the Order subsequently.

Specifically as to the requests for action;

On Friday, March 27, 1987, a representative of ENPRO Services, Inc. visited the plant at our request. ENPRO is an experienced hazardous materials cleanup firm located in Newburyport, MA. Since we knew of no way to remove the oil stain from the blacktop we asked ENPRO for advice. After visiting the site, Mr. John Davey of ENPRO sent the attached letter (see letter to Randolph Olson, April 6, 1987). The black stain on our blacktop is the result of very small amounts of fuel oil being deposited when the heating oil fill hose leading to our interior heating oil tank is disconnected and is not related to the temporary storage of a drum of diesel fuel in the same area. As you can see from Mr. Davey's letter, an extremely small amount of oil can cause a stain of the type observed by the Commission. At no time since the Commission's February 21 inspection has there been free-standing oil on the pavement at the fuel oil fill area. Furthermore, the stained area is outside the Buffer Zone.

To: Commission Member

Page: Two

Date: April 13, 1987

2. Consistent with ENPRO's recommendations, our procedure for preventing any significant spillage of oil has been to station one of our employees at the tank during the entire unloading operation. He will have immediately available at least four bags of Speedi Dri. Any waste oil residue will, as is our practice, be disposed of in accordance with state waste disposal regulations.

- 3. At the Commission's meeting on March 18, 1987 an invitation was extended to E&C to meet with the Commission to discuss specific issues raised by the Enforcement Order. We therefore request that E&C be placed on the agenda for a future meeting of the Commission so that we may discuss this item and any other matters which have not been resolved.
- 4. As of the date of the Commission's Order all hazardous materials are being stored in a proper manner as required by all relevant regulations (see attached letter of March 24, 1987 to the Canton Board of Health).
- 5. The bermed area has not been, and will not be, used for the storage of hazardous materials (see letter to Board of Health).
- 6. Pursuant to both the Canton Hazardous Materials By-Laws and the Massachusetts Hazardous Waste Regulations, the information requested by the Commission is already in the possession of the Town of Canton.
- 7. There has not been, and will not be, storage of hazardous materials within the 100 foot Buffer Zone (see letter to Board of Health).
- 8. E&C's practice for clearing snow from its parking facilities is the same as those of other firms. Based upon our response to the other requests for action, and the information contained in our letter to the Board of Health, we believe it is now clear that hazardous materials are not stored in areas where plowed snow is accumulated.
- I hope the above response indicates our sincere interest in responding to the concerns of the Commission. However, E&C is obligated to also respond to the specific allegations of violation mentioned by the Commission in its Order. The Order lists three violations: (1) construction of a diked area for hazardous material storage without filing a Notice of Intent; (2) improper storage of hazardous materials; (3) a "large" oil spill.

To: Commission Member

Page: Three

Date: April 13, 1987

For the following reasons E&C we believe the items in these allegations do not fairly serve as a basis for an Enforcement Order.

- (1) The construction of the berm was done in accordance with the recommendations of the Canton Board of Health and Massachsuetts DEQE in mid-1983. There has been no storage of drummed raw materials within the bermed area since mid-1984, with only empty drums being accumulated at that location since that time (see letter to Board of Health).
- (2) All drums located within the 100 foot buffer area at the time of the Commission's February 21 inspection were empty. Those drums which were located outside at the time of the inspection, and which contained materials, were all located adjacent to plant buildings outside the Buffer Zone. All of these drums were intact and none were leaking (see letter to Board of Health).
- (3) Our review of the "oil spill" is covered in the response to request for action #1.

All of this information was made available by representatives of E&C to the Conservation Commission at its meeting of March 18, 1987. Our verbal presentation was followed by the submission of the March 24, 1987 letter to the Canton Board of Health, copies of which were also sent to the Conservation Commission.

At the Commission meeting on March 18, an E&C representative requested the Commission defer any vote on the Order until it received, and had time to review, a copy of the submission to the Board of Health which responded to the specific allegations raised by the Commission along with issues raised by the Board of Health.

We believe the information supplied by E&C demonstrates that there was no violation of the statutory authorities cited by the Commission. In fact, after a presentation to, and discussion with, the Board of Health on March 24, the Board decided not to pursue an enforcement action against E&C.

However, the Conservation Commission voted to issue the Order prior to receving E&C's letter.

With regard to the matter of inspection of our facility by the CCC or any other Town Board we will be glad to provide access to our property at any reasonable hour (including weekends). We do however think it is reasonable and will avoid further misunderstandings if an E&C representative accompanies the inspectors to answer questions. To: Commission Member

Page: Four

Date: April 13, 1987

More importantly, as we informed the Commission at its March 18 meeting, E&C also has site security obligations since we are a defense contractor and are subject to Department of Defense regulations regarding access to facilities. These Federal regulations require all non-employee visitors to identify themselves, sign in at the facility reception area, and be escorted by an E&C employee.

The Enforcement Order also refers to a "hasty cleanup." From discussions with the Board of Health agent shortly after the February 21 inspection we became aware of the concerns about drum storage. While we also became aware that those conducting the inspection mistakenly believed many of the drums were full of chemicals, we were nonetheless determined to react quickly and address the "housekeeping" issues as a means of demonstrating our willingness to address the concerns of Town Boards and Commissions.

In its Enforcement Order, the Conservation Commission states that it "would like Canton industries to manage environmental problems effectively by making pollution abatement and natural resource protection a primary goal." We agree. Our letter of March 24 demonstrates that E&C has this commitment, and has devoted considerable time and expense in addressing its material handling practices.

In light of all the foregoing therefore we respectfully request the Commission to rescind its Enforcement Order of March 18. Alternatively, we request the matter be included on the agenda for the May 13 meeting of the Commission, when I or representatives of E&C will be available to discuss the matter further.

Sincerely.

Graham W. Rowe Vice President and General Manager

Attachments: (1) ENPRO letter dated April 6, 1987

(2) Emerson & Cuming letter dated March 24, 1987

cc: Board of Selectmen - Town of Canton
Board of Health - Town of Canton

Peter Bofhossian - Town Engineer
Joseph H. Malloy - Town Counsel

Gary Clayton - Director, DEQE Division of Wetlands
Ms. Lee Breckenridge - Chief, Division of Environmental

Protection, Dept. of the Attorney General

Miss Wendy Disch - Corp of Engineers

Walter Spiegel - Attorney for Emerson & Cuming, Inc.

### ENPRO SERVICES, INC.

12 Mulliken Way, Lord Timothy Dezter Industrial Green, Newburyport, Messechusetts 01950/(617) 465-1595 - 24 HOURS
FAX (617) 465-2050

April 6, 1987

Mr. Randolph M. Olsen Emerson & Cuming Polyfibron Division W.R. Grace & Company 59 Walpole Street Canton, MA 02021

Dear Mr. Olsen;

This letter is to serve as confirmation of our meeting of March 27, 1987 regarding certain oil staining at your facility.

In summary, the following represents observations and recommendations for the above.

- A quantity of #2 heating oil estimated to be less than 2 gallons has inadvertly been released in an area contiguous to the tank fill.
- It appears that the release has not migrated, other than staining, beyond the immediate area proximate to the fill.
- While the staining is not asthetically pleasing, it does not appear, based on this writers opinion, to require immediate attention. This rationale is supported by the following factors.

### ENPRO SERVICES, INC.

Mr. Randolph M. Olsen Emerson & Cuming Page 2

It is probable that the amount of oil released has not penetrated the 6" layers of bitmonous concrete. In addition when proposed construction in the area occurs that area will be investigated to confirm lack of penetration has occured. If the product has penetrated the asphalt appropriate remedial measures will be iniated.

The prime recommendation for the short-term would be to have plant personnel in attendance during unloading operation and as a contingency a quantity of sorbent material in proximity to the area as is apparent from site conditions, and from interrogatories with site personnel.

Should you have any further questions do not hesitate to contact my office.

Very truly yours,

John R. Davey Vice President

JRD:1sc

March 24, 1987

Canton Board of Health 1492 Washington St. Canton, MA.

Dear Board Members,

This document is submitted for your review and consideration by Emerson & Cuming, Inc. (E & C) in response to the Board's actions at its meeting on March 10, 1987 at which it was alleged that E & C had stored drums of hazardous materials at its Walpole St. plant in violation of the Canton Hazardous Materials By-Law. Newspaper articles reported that this allegation resulted from an inspection of the premises of E & C's Walpole St. facility on Saturday, February 21, 1987. Although E & C has not been notified officially of any Board action we are submitting the following information in order to ensure that the Board has all relevant facts in front of it for its further consideration.

In order to understand the Walpole St.'s current procedures for the handling of drummed liquids it is necessary to review actions taken by E & C since 1982. From late 1982 through the end of 1984, the plant completed a number of projects to improve materials handling and storage. These projects were based upon recommendations of Regina McCarthy, the former Board of Health Agent, the Massachusetts Department of Environmental Quality Engineering (DEQE), E & C plant management, and E & C's engineering consultant, Camp, Dresser & McKee. All of these projects were undertaken with the knowledge and concurrence of the Canton Board of Health and DEQE. Upon completion of these projects DEQE wrote E & C:

"It is the Department's opinion that Emerson & Cuming has acted in good faith and has taken all appropriate steps as requested. The Department would like to extend its appreciation to you for your cooperation and continued efforts in this matter." (see Exhibit 1)

One of the projects undertaken by E & C at the suggestion of Ms. McCarthy and DEQE was the construction of a berm on a previously paved area which was being used at that time for the storage of drummed raw materials. This was intended as a temporary preventive measure until such time as completion of other projects allowed for establishment of other secure storage areas.

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The berm was constructed in mid-1983 with the knowledge and concurrence of Ms. McCarthy and DEQE. By the middle of 1984, the other projects, including conversion of the existing bulk storage tank system, reductions in raw material purchase order quantities, and the movement of several production areas, were completed. By reducing the amount of raw materials, and opening space inside the plant buildings, these projects allowed for the storage of drummed raw materials <u>inside</u> the plant.

At approximately the same time the plant's hazardous waste storage area, which was located outside in a diked, roofed area was also moved inside the plant into an area built and designated specifically for the storage of hazardous waste. Thus, since the latter part of 1984 the plant has not stored outside (with the exception noted below) drums of liquid raw materials or hazardous waste (see Exhibits 2 and 3).

After the bermed area ceased use as a storage area for drummed raw materials it was designated for the accumulation of empty drums for removal. In late 1984 the plant established procedures for the accumulation of empty drums in the bermed area and on pallets prior to movement to the bermed area (see Exhibit 2).

All drums observed in the bermed area by Board of Health and Conservation Commission members on February 21, 1987 were empty. In addition, all other drums observed on that date anywhere else outside the plant buildings were empty with the following exceptions;

First, one drum of kerosene and one drum of diesel fuel both stored adjacent to the plant. The placement of these drums outside was very recent and intended as a temporary measure. The use of these drums was necessary because fuel oil from E & C's internal fuel tanks which had been used to fuel two existing pieces of equipment, was consistently causing clogging in the equipment and an alternative was required. The drums were placed outside pending arrival of safety storage cabinets which would allow their storage inside the building. Because of the flammability of these materials both fire regulations and insurance coverage precluded storage inside unless the cabinets were available. Both drums_have now been moved inside the plant.

No spillage of material from either drum was observed at any time. We believe any material on the pavement observed on February 21 near the diesel fuel drum was a result of repeated connection and disconnection during deliveries of fuel oil. The connection for the interior fuel oil tank is directly adjacent to the former location of the diesel fuel drum.

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Secondly, at a meeting of the Canton Conservation Commission on March 18, the Walpole St. plant manager was shown pictures taken during the February 21 inspection. In one photo, 3 silver drums were shown adjacent to a door near the flotation production area of the plant. The plant manager had not observed these drums during his personal inspection of the outside of the plant on the morning of Monday, February 23.

Subsequent to the Conservation Commission meeting a review of records and employees was conducted regarding these 3 drums. It was determined that the 3 drums contained a liquid raw material used in the production process. The drums were apparently moved by forklift to the area shown in the photo from the plant's shipping and receiving area on Friday, February 20. It is normal procedure to move drums from shipping and receiving to specific production areas. It is then the responsibility of the production area to move the materials inside to their area. In this case, the drums were apparently not moved inside to the production area until Sunday, February 22. While we do not believe this incident constitutes "storage" under the Canton Hazardous Materials By-Law, the plant has taken steps to ensure that delays in moving materials while in transit around the plant are minimized.

After the inspection on February 21, 1987 all empty drums were removed from the plant site. These drums were removed by two companies, Ryan Barrel of Peabody, Ma. and Northeast Solvents of North Andover, Ma. Both companies have regularly removed empty drums from the plant in the past. Attached as Exhibit 4 is the documentation for the removal of the drums which confirms their empty status. The total of empty drums removed is greater than the number observed during February 21 since it includes empty drums accumulated inside the building and empties generated by ongoing production between February 21 and the date of the pick-ups. The removal of the drums was prompted by E & C's understanding, confirmed by the Board of Health Agent, John Fralick, that the Board was concerned about housekeeping and appearance in the yard area. We believed our prompt action would demonstrate E & C's sensitivity to the Board's concerns. As a further step to address these concerns the plant will limit future empty drum staging for removal to the interior of the plant.

At the Conservation Commission meeting we were asked to explain why empty drums would still have "hazard" labels on them. Initial placement of these designations is required by US Department of Transportation Regulations. Per these regulations all markings and labels must be left in place on empty drums as if the drums were full of their original contents. A reference to these regulations can be found on the invoices from Ryan Barrel which are included in Exhibit 4. Thus, it would be improper for E & C to alter or remove the labels even though the drums are empty.

Based upon the above information, Emerson & Cuming, Inc. respectfully requests that the Board reconsider its findings of March 10. During the past few years, E & C has cooperated fully with the Board, and has had numerous visits by the Board of Health Agents and we believe we have complied with every request by the Agents. In fact, Mr. Fralick has inspected the plant since the February 21 inspection. It is our intent to continue that cooperation and hope the information conveyed in this letter will enable the current matter to be resolved,

Mark Stoler

MS/1mm

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cc: Canton Conservation Commission

Exhibit 1



### The Commonwealth of Massachusetts Department of Environmental Quality Engineering Metropolitan Boston . Northeast Region 5 Commonwealth Teenwe

Makum. Massachusetts 01801

935-2160

March 1, 1985

Emerson & Cuming
Dewey and Almy Chemical Division
W.R. Grace and Company
59 Walpole Street
Canton, Ma. 02021

RE: CANTON-"Spill Control Audit at Plant #2" Engineering Report

Attention: Mr. Randolph M. Olson, Plant Manager

Dear Mr. Olson:

On February 27, 1985, Engineers from the Metropolitan Boston/Northeast Region of the Department of Environmental Quality Engineering, Division of Water Pollution Control, met with yo and Ms. Gina McCarthy of the Canton Board of Health to review and inspect the Logress toward accomplishing the recommended actions contained in a report entered:

Lmerson & Cuming
Canton, Massachusetts
Spill Control Audit

at

Plant No. 2"

The above report was prepared by Camp Dresser & McKee, Inc., and dated January, 196 The report was requested in a letter from the Department, dated November 5, 1982 and was the result of an inspection of your facility at the above address on November 2, 1982. The inspection was conducted at the request of the Canton Board of Health to investigate the drainage patterns both inside and outside the plant as they related to any existing or potential discharge of pollutants to an existing raceway which flows under the building and property. The raceway is diverted from the East Branch River of the Neponset River and discharges back to the River throug a 24 inch concrete pipe. The Board of Healths concern in this matter was the potential for any pollutants to reach the Town Wells downstream from your facility.

The inspection at that time did not reveal the presence of any existing discharges nor the appearance of any pollutants at the outfall pipe. However; the Department's letter did point out that due to the existance of the raceway, certain chemical storage and the use of these chemicals, or unauthorized use presented a potential discharge. Therefore; the Department recommended that some appropriate steps be taken to address this potential discharge.

As a result, the aformentioned report addressed these issues and made recommendations including, sealing the entrance to the raceway, sealing grates, trenches, drains and accesses from the plant, paving along Walpole Street, to

Emerson & Cuming Page-2-

divert groundwater run-off away from the building, constructing dikes and berms around potential spill areas and chemical storage areas and in general, better housekeeping procedures.

It was observed during the inspection that all of the above has been completed and that on-going improvements will continue to address the elimination of potential releases to the East Branch River. The Camp Dresser & McKee, Inc., reported did reveal, as a result of their investigation, the discharge of non-contact coolinwater i.e. steam condensate, air conditioning and a groundwater sump discharge to the raceway. These discharges will continue and an appropriate "NPDES" permit application has been made to EPA which was acknowledged by them in writing on June 13, 1984.

It is the Department's opinion that Emerson & Cuming has acted in good faith and has taken all appropriate steps as requested. The Department would like to extend its appreciation to you for your cooperation and continued efforts in this matter.

If you have any questioning regarding this matter, you may contact Mr. David G. Erekson of my staff at 935-2160.

Very truly yours,

William A. Krol, P.E.

Deputy Regional Environmental

Engineer

DGE/bc

cc: Canton Board of Health, 1492 Washington Street, Canton, Ma. 02021
Attention: Ms. Regina McCarthy
Department of Environmental Quality Engineering, Metropolitan Boston/
Northeast Region, 5 Commonwealth Avenue, Woburn, Ma. 01801
Attention: Richard Chalpin, Acting Regional Environmental Engineer
Department of Environmental Quality Engineering, Division of Hazardous

Waste, One Winter Street, Boston, Ma. 02108

Exhibit 2

#### AFFIDAVIT

Randolph M. Olson, being duly sworn, deposes and says:

- 1. My name is Randolph M. Olson
- Since January, 1981 I have worked at the Emerson & Cuming plant on Walpole St. in Canton.
- 3. Since January 1981, I have held the position of Plant Manager. In that position I am responsible for the overall operation of the facility.
- 4. From the latter part of 1982 through 1984 Emerson & Cuming employees, under my direction, implemented a number of projects to improve materials handling at the plant. Several of these projects were suggested by the Massachusetts Department of Environmental Quality Engineering (DEQE) and the Canton Board of Health Agent, Ms. Regina McCarthy.
- 5. Among these improvements was the installation of a berm on a paved area on the north side of the plant around the existing storage of raw materials. The bermed area was constructed with the knowledge and approval of DEQE and Ms. McCarthy. From approximately the middle of 1983 until the latter part of 1984 some raw material drums were stored in this area.
- 6. As part of overall changes in materials handling, I decided in 1984 that all drummed liquid raw materials should be stored inside the plant building. In the latter part of 1984, I informed plant employees that only empty drums were to be stored outside the plant building and that all drums were to be checked to ensure they were empty prior to placement outside.
- Also during the latter part of 1984 an area inside the plant was built and designated specifically for the storage of hazardous wastes.
- 8. To the best of my knowledge and belief, since the latter part of 1984 no drums containing liquid raw materials or wastes have been stored outside at the plant. The only exceptions are one drum of diesel fuel and one drum of kerosene which were temporarily stored outside of the plant for safety reasons. To the best of my knowledge and belief there was no discharge of material from either of these drums.

9. On February 23, 1987, between 9 and 10 AM, I inspected all drums located on the plant site outside of the buildings. To the best of my knowledge and belief, all of the drums were empty, with the exception of the two drums mentioned in Paragraph 8.

Randolph M. Olson

Sworn and subscribed before me this Allday of March 1987.

Notary Public

Exhibit 3

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#### AFFIDAVIT

Charles J. Moore, being duly sworn, deposes and says:

- 1. My name is Charles J. Moore.
- 2. I have been employed at the Emerson & Cuming plant on Walpole St. in Canton since January 11, 1982.
- I currently hold the position of Shipper/Receiver at the plant.
- 4. As a Shipper/Receiver my duties include responsibility for material deliveries and pick-ups at the plant along with ensuring that the correct documentation is maintained.
- 5. As part of my duties, I am responsible for the shipment of empty raw material drums from the plant.
- 6. It has been standard plant operating procedure since 1984 for all drums containing raw materials to be stored inside the plant. Since 1984, to the best of my knowledge and belief, only empty drums have been stored outside. The only exception to this are one drum of diesel fuel and one drum of kerosene which were recently stored outside on a temporary basis.
- 7. For at least the last two years the companies removing empty drums from the plant are Ryan Barrel of Peabody, Mass. and Northeast Solvents of N. Andover, Mass. Representatives of these companies have told me that they will only remove drums that contain no liquids of any type, including water.
- 8. In late February and early March of 1987, Ryan Barrel and Northeast Solvents picked up empty drums at the plant. These drums included those stored in the bermed area on the north side of the plant and those empty drums stored outside at other locations at the plant.
- 9. I assisted in loading the empty drums during the above-referenced pick-ups. To the best-of my knowledge and belief no liquids were in the drums at that time.

Charles J. Moore

Swork and subscribed before me this 34th day of March 1987.

Notary Public

Exhibit 4

JOHN COHENNO ....

### **EMERSON** & CUMING Emerson & Cuming, Inc.

A GRACE Co

To .

Ryan Barrel Co. 56 Pulaski St. Peabody, Ma. 41760

SHIP A EILL TO THE LOCAT ON INDICATED BELOW

2/26/87

2/24/87



Removal of Empty Barrels



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A GRACE : . .

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## & CUMING Emerson & Cuming, Inc

A GRACE CO

Ic • Ryan Barrel Co. 56 Pulaski St. Peabody, Ma. 01760 FURCHASE ORDER NO 📂

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Removal of empty barrels

As Requested

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Emerson & Cuming, Inc. A **GRACE** Co.

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## Ryan Barrel Co., Inc.

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*With regard to most regulated residues, EPA's 40 OF# 261.7 Says: "A contabner...s empty of:

- (i) All writes have been removed that can be removed using the practices terminal employed to remove materials from that type of container, e.g., pouring, purping, and aspirating, and
- /li) No tire than 2.3 centimeters (one inch) of residue remain on the bottom of the container....

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous material: that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EhA says the container is empty only 'if the container... has been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

**DOT'S 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.



## Ryan Barrel Co., Inc.

RECONDITIONERS - DEALERS IN ALL TYPES OF STEEL CONTAINERS SPECIALIZING IN

OPEN MEAD CONTAINERS FEATURING CHEMICAL-SOLVENT PROOF-BAKED-ON LININGS 56 PULASKI STREET, P.O. BOX 589, PEABODY, MASS. 01960
NORTH SHORE AREA CALL 532-1130 - BOSTON AREA CALL 322-9110

"SERVING INDUSTRY FOR OVER HALF A CENTURY"

#### EMPTY DRUK CERTILICATION

I here, cortil that these drums are "empty as that term is defined in the national Environmental Irotection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.SI Department of Transportation, 49 CFR 173.29.**

Date: 3/4/87 Slip number: 2/9/3

Company Name: Emerson + Cuming Signed By: Charles 10 CER 361.7

*With regard to most regulated residues, EFA's 40 CFR 261.7 says: "A container...is empty if:

- (i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, and
- (ii) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container...."

EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EPA says the container is empty only "if the container... has been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

**DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A DOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.

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#### EMPTY DRUM HAZARDOUS MATERIAL SHIPPING FORM



Emersona Cumming Canton Ma. CONSIGNEE and DESTINATION (CHECK BOX)

SERVICE CHEMICAL CORPORATION 221 SUTTON STREET

NO. ANDOVER, MA. 01845 TEL. (617) 685-2121

NORTH EAST SOLVENTS CORPORATION

221 SUTTON STREET NO. ANDOVER, MA. 01845

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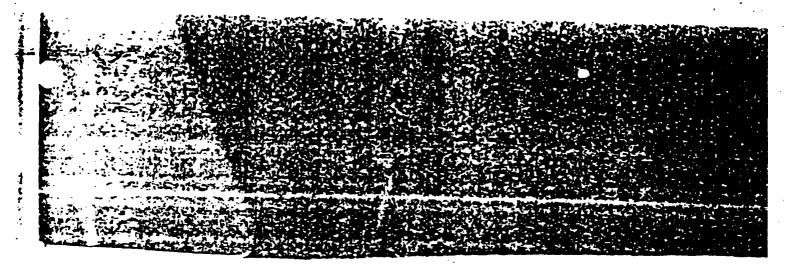
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CHEMTREK 1-800-424-930

DRIVER'S SIGNATURE __

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North East Solvents Reclamation Corp. 221 SUTTON STREET NO. ANDOVER, MASS. 01845 TEL. (617) 683-1002

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1. RENDER INVOICE IN TRIPLICATE TO: W.R. GRACE 4 CO. POLYFIBRON DIVISION

2. MAIL INVOICES TO ADDRESS CHECKED ABOVE UNLESS OTHERWISE INDICATED.

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3. SHOW PURCHASE ORDER NUMBER ON ALL INVOICES, SHIPPING NOTICES, BILL OF LADING, EXPRESS RECEIPTS, PACKAGES, AND PACKING SLIPS.

4. SHOW SHIPPING ADDRESS ON ALL SHIPPING PAPERS.

An acceptance of this order or any shipment of goods ordered hereby or furnishing any services called for hereunder shall be an acceptance of the terms and contions on the face and back hereof as the only terms and conditions applying to to purchase and sale of the said goods or services. Your order is hereby acknowledged and accepted. Shipment will be may or services rendered in accordance with the above schedule...

Seller's Name_

GKACE

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## GRACE

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1. RENDER INVOICE IN TRIPLICATE TO: W.R. GRACE & CO. POLYFIBRON DIVISION

2. MAIL INVOICES TO ADDRESS CHECKED ABOVE UNLESS OTHERWISE INDICATED.

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OF LADING, EXPRESS RECEIPTS, PACKAGES, AND PACKING SLIPS.

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Seller's Name_____

March 24, 1987

Canton Board of Health 1492 Washington St. Canton, MA.

Dear Board Members,

This document is submitted for your review and consideration by Emerson & Cuming, Inc. (E & C) in response to the Board's actions at its meeting on March 10, 1987 at which it was alleged that E & C had stored drums of hazardous materials at its Walpole St. plant in violation of the Canton Hazardous Materials By-Law. Newspaper articles reported that this allegation resulted from an inspection of the premises of E & C's Walpole St. facility on Saturday, February 21, 1987. Although E & C has not been notified officially of any Board action we are submitting the following information in order to ensure that the Board has all relevant facts in front of it for its further consideration.

In order to understand the Walpole St.'s current procedures for the handling of drummed liquids it is necessary to review actions taken by E & C since 1982. From late 1982 through the end of 1984, the plant completed a number of projects to improve materials handling and storage. These projects were based upon recommendations of Regina McCarthy, the former Board of Health Agent, the Massachusetts Department of Environmental Quality Engineering (DEQE), E & C plant management, and E & C's engineering consultant, Camp, Dresser & McKee. All of these projects were undertaken with the knowledge and concurrence of the Canton Board of Health and DEQE. Upon completion of these projects DEQE wrote E & C:

"It is the Department's opinion that Emerson & Cuming has acted in good faith and has taken all appropriate steps as requested. The Department would like to extendits appreciation to you for your cooperation and continued efforts in this matter." (see Exhibit 1)

One of the projects undertaken by E & C at the suggestion of Ms. McCarthy and DEQE was the construction of a berm on a previously paved area which was being used at that time for the storage of drummed raw materials. This was intended as a temporary preventive measure until such time as completion of other projects allowed for establishment of other secure storage areas.

The berm was constructed in mid-1983 with the knowledge and concurrence of Ms. McCarthy and DEQE. By the middle of 1984, the other projects, including conversion of the existing bulk storage tank system, reductions in raw material purchase order quantities, and the movement of several production areas, were completed. By reducing the amount of raw materials, and opening space inside the plant buildings, these projects allowed for the storage of drummed raw materials <u>inside</u> the plant.

At approximately the same time the plant's hazardous waste storage area, which was located outside in a diked, roofed area was also moved inside the plant into an area built and designated specifically for the storage of hazardous waste. Thus, since the latter part of 1984 the plant has not stored outside (with the exception noted below) drums of liquid raw materials or hazardous waste (see Exhibits 2 and 3).

After the bermed area ceased use as a storage area for drummed raw materials it was designated for the accumulation of empty drums for removal. In late 1984 the plant established procedures for the accumulation of empty drums in the bermed area and on pallets prior to movement to the bermed area (see Exhibit 2).

All drums observed in the bermed area by Board of Health and Conservation Commission members on February 21, 1987 were empty. In addition, all other drums observed on that date anywhere else outside the plant buildings were empty with the following exceptions;

First, one drum of kerosene and one drum of diesel fuel both stored adjacent to the plant. The placement of these drums outside was very recent and intended as a temporary measure. The use of these drums was necessary because fuel oil from E & C's internal fuel tanks which had been used to fuel two existing pieces of equipment, was consistently causing clogging in the equipment and an alternative was required. The drums were placed outside pending arrival of safety storage cabinets which would allow their storage inside the building. Because of the flammability of these materials both fire regulations and insurance coverage precluded storage inside unless the cabinets were available. Both drums have now been moved inside the plant.

No spillage of material from either drum was observed at any time. We believe any material on the pavement observed on February 21 near the diesel fuel drum was a result of repeated connection and disconnection during deliveries of fuel oil. The connection for the interior fuel oil tank is directly adjacent to the former location of the diesel fuel drum.

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Secondly, at a meeting of the Canton Conservation Commission on March 18, the Walpole St. plant manager was shown pictures taken during the February 21 inspection. In one photo, 3 silver drums were shown adjacent to a door near the flotation production area of the plant. The plant manager had not observed these drums during his personal inspection of the outside of the plant on the morning of Monday, February 23.

Subsequent to the Conservation Commission meeting a review of records and employees was conducted regarding these 3 It was determined that the 3 drums contained a liquid raw material used in the production process. The drums were apparently moved by forklift to the area shown in the photo from the plant's shipping and receiving area on Friday, February 20. It is normal procedure to move drums from shipping and receiving to specific production areas. then the responsibility of the production area to move the materials inside to their area. In this case, the drums were apparently not moved inside to the production area until Sunday, February 22. While we do not believe this incident constitutes "storage" under the Canton Hazardous Materials By-Law, the plant has taken steps to ensure that delays in moving materials while in transit around the plant are minimized.

After the inspection on February 21, 1987 all empty drums were removed from the plant site. These drums were removed by two companies, Ryan Barrel of Peabody, Ma. and Northeast Solvents of North Andover, Ma. Both companies have regularly removed empty drums from the plant in the past. Attached as Exhibit 4 is the documentation for the removal of the drums which confirms their empty status. The total of empty drums removed is greater than the number observed during February 21 since it includes empty drums accumulated inside the building and empties generated by ongoing production between February 21 and the date of the pick-ups. The removal of the drums was prompted by E & C's understanding, confirmed by the Board of Health Agent, John Fralick, that the Board was concerned about housekeeping and appearance in the yard area. We believed our prompt action would demonstrate E & C's sensitivity to the Board's concerns. As a further step to address these concerns the plant will limit future'empty drum staging for removal to the interior of the plant.

At the Conservation Commission meeting we were asked to explain why empty drums would still have "hazard" labels on them. Initial placement of these designations is required by US Department of Transportation Regulations. Per these regulations all markings and labels must be left in place on empty drums as if the drums were full of their original contents. A reference to these regulations can be found on the invoices from Ryan Barrel which are included in Exhibit 4. Thus, it would be improper for E & C to alter or remove the labels even though the drums are empty.

Based upon the above information, Emerson & Cuming, Inc. respectfully requests that the Board reconsider its findings of March 10. During the past few years, E & C has cooperated fully with the Board, and has had numerous visits by the Board of Health Agents and we believe we have complied with every request by the Agents. In fact, Mr. Fralick has inspected the plant since the February 21 inspection. It is our intent to continue that cooperation and hope the information conveyed in this letter will enable the current matter to be resolved,

Mark Stoler

MS/1mm

( ...

cc: Canton Conservation Commission

Exhibit 1

.



## The Commonwealth of Massachusetts Department of Environmental Quality Engineering Metropolitan Boston - Northwast Region 5 Commonwealth Account

935-2160

March 1, 1985

Emerson & Cuming
Dewey and Almy Chemical Division
W.R. Grace and Company
59 Walpole Street
Canton, Ma. 92021

RE: CANTON-"Spill Control Audit at Plant #2" Engineering Report

Attention: Mr. Randolph M. Olson, Plant Manager.

Dear Mr. Olson:

On February 27, 1985, Engineers from the Metropolitan Boston/Northeast Region of the Department of Environmental Quality Engineering, Division of Water Pollution Control, met with yo and Ms. Gina McCarthy of the Canton Board of Health to review and inspect the logress toward accomplishing the recommended actions contained in a report entered:

imerson & Cuming
Canton, Massachusetts
Spill Control Audit

at

Plant No. 2"

The above report was prepared by Camp Dresser & McKee, Inc., and dated January, 198 The report was requested in a letter from the Department, dated November 5, 1982 and was the result of an inspection of your facility at the above address on November 2, 1982. The inspection was conducted at the request of the Canton Board of Health to investigate the drainage patterns both inside and outside the plant as they related to any existing or potential discharge of pollutants to an existing raceway which flows under the building and property. The raceway is diverted from the East Branch River of the Neponset River and discharges back to the River throug a 24 inch concrete pipe. The Board of Healths concern in this matter was the potential for any pollutants to reach the Town Wells downstream from your facility.

The inspection at that time did not reveal the presence of any existing discharges nor the appearance of any pollutants at the outfall pipe. However; the Department's letter did point out that due to the existance of the raceway, certain chemical storage and the use of these chemicals, or unauthorized use presented a potential discharge. Therefore; the Department recommended that some appropriate steps be taken to address this potential discharge.

As a result, the aformentioned report addressed these issues and made recommendations including, sealing the entrance to the raceway, sealing grates, trenches, drains and accesses from the plant, paving along Walpole Street, to

Emerson & Cuming Page-2-

divert groundwater run-off away from the building, constructing dikes and berms around potential spill areas and chemical storage areas and in general, better housekeeping procedures.

It was observed during the inspection that all of the above has been completed and that on-going improvements will continue to address the elimination of potential releases to the East Branch River. The Camp Dresser & McKee, Inc., report did reveal, as a result of their investigation, the discharge of non-contact cooling water i.e. steam condensate, air conditioning and a groundwater sump discharge to the raceway. These discharges will continue and an appropriate "NPDES" permit application has been made to EPA which was acknowledged by them in writing on June 13, 1984.

It is the Department's opinion that Emerson & Cuming has acted in good faith and has taken all appropriate steps as requested. The Department would like to extend its appreciation to you for your cooperation and continued efforts in this matter.

If you have any questioning regarding this matter, you may contact Mr. David G. Erekson of my staff at 935-2160.

Very truly yours,

William A. Krol, P.E.

Deputy Regional Environmental

Engineer

DGE/bc

cc: Canton Board of Health, 1492 Washington Street, Canton, Ma. 02021
Attention: Ms. Regina McCarthy
Department of Environmental Quality Engineering, Metropolitan Boston/
Northeast Region, 5 Commonwealth Avenue, Woburn, Ma. 01801
Attention: Richard Chalpin, Acting Regional Environmental Engineer
Department of Environmental Quality Engineering, Division of Hazardous
Waste, One Winter Street, Boston, Ma. 02108

Exhibit 2

#### AFFIDAVIT

Randolph M. Olson, being duly sworn, deposes and says:

- 1. My name is Randolph M. Olson
- 2. Since January, 1981 I have worked at the Emerson & Cuming plant on Walpole St. in Canton.
- Since January 1981, I have held the position of Plant Manager. In that position I am responsible for the overall operation of the facility.
- 4. From the latter part of 1982 through 1984 Emerson & Cuming employees, under my direction, implemented a number of projects to improve materials handling at the plant. Several of these projects were suggested by the Massachusetts Department of Environmental Quality Engineering (DEQE) and the Canton Board of Health Agent, Ms. Regina McCarthy.
- 5. Among these improvements was the installation of a berm on a paved area on the north side of the plant around the existing storage of raw materials. The bermed area was constructed with the knowledge and approval of DEQE and Ms. McCarthy. From approximately the middle of 1983 until the latter part of 1984 some raw material drums were stored in this area.
- 6. As part of overall changes in materials handling, I decided in 1984 that all drummed liquid raw materials should be stored inside the plant building. In the latter part of 1984, I informed plant employees that only empty drums were to be stored outside the plant building and that all drums were to be checked to ensure they were empty prior to placement outside.
- 7. Also during the latter part of 1984 an area inside the plant was built and designated specifically for the storage of hazardous wastes.
- 8. To the best of my knowledge and belief, since the latter part of 1984 no drums containing liquid raw materials or wastes have been stored outside at the plant. The only exceptions are one drum of diesel fuel and one drum of kerosene which were temporarily stored outside of the plant for safety reasons. To the best of my knowledge and belief there was no discharge of material from either of these drums.

On February 23, 1987, between 9 and 10 AM, I inspected all drums located on the plant site outside of the buildings. To the best of my knowledge and belief, all of the drums were empty, with the exception of the two drums mentioned in Paragraph 8.

Randolph M. Olson

Sworn and subscribed before me this Alleday of March 1987.

Notary Public

Exhibit 3

#### AFFIDAVIT

Charles J. Moore, being duly sworn, deposes and says:

- 1. My name is Charles J. Moore.
- I have been employed at the Emerson & Cuming plant on Walpole St. in Canton since January 11, 1982.
- I currently hold the position of Shipper/Receiver at the plant.
- 4. As a Shipper/Receiver my duties include responsibility for material deliveries and pick-ups at the plant along with ensuring that the correct documentation is maintained.
- 5. As part of my duties, I am responsible for the shipment of empty raw material drums from the plant.
- 6. It has been standard plant operating procedure since 1984 for all drums containing raw materials to be stored inside the plant. Since 1984, to the best of my knowledge and belief, only empty drums have been stored outside. The only exception to this are one drum of diesel fuel and one drum of kerosene which were recently stored outside on a temporary basis.
- 7. For at least the last two years the companies removing empty drums from the plant are Ryan Barrel of Peabody, Mass. and Northeast Solvents of N. Andover, Mass. Representatives of these companies have told me that they will only remove drums that contain no liquids of any type, including water.
- 8. In late February and early March of 1987, Ryan Barrel and Northeast Solvents picked up empty drums at the plant. These drums included those stored in the bermed area on the north side of the plant and those empty drums stored outside at other locations at the plant.
- 9. I assisted in loading the empty drums during the above-referenced pick-ups. To the best-of my knowledge and belief no liquids were in the drums at that time.

Charles J. Moore

Sworn and subscribed before me this 34hday of March 1987.

Notary Public

133

Exhibit 4

# ENERSON & CUMING Emerson & Cuming, Inc. A GRACE CO

To .

Ryan Barrel Co. 56 Pulaski St. Peabody, Ma. @1760

SHIP & EILL TO THE LOCAT ON INDICATED BELOW

2/26/87

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Removal of Empty Barrels



Emerger in Chiming, Inc.

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## EMERSON & CUMING

Emerson & Cuming, Inc. A GRACE Co.

> Ryan Barrel Co. 56 Pulaski St. Peabody, Ma. 01760

FURCHASE ORDER NO

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Removal of empty barrels

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Emerson & Cuming, Inc. A GRACE Co.

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PEABODY, MASS.
PHONE
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## Ryan Barrel Co., Inc.

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EPA has explained this rule, saying that "one inch of waste material is an overriding constraint and may remain in an empty container only if it cannot be removed by normal means. The rationale for this provision is that there are certain tars and other extremely viscous materials that will remain in the container even after the container is emptied by normal means."

For residues of products specifically listed by name in 40 CFR 261.33(e), EFA says the container is empty only 'if the container... nas been triple-rinsed using a solvent capable of removing" the product, or has been cleaned by another method shown to achieve equivalent removal.

**DOT's 49 CFR 173.29 says that all openings on the empty container must be closed, and that all markings and labels must be in place as if the drum were full of its original contents. A BOT shipping paper is not required for transportation of a drum for reconditioning via contract or private motor carrier. DOT placarding is not required for vehicles carrying empty containers.



## Ryan Barrel Co., Inc.

RECOMOTIONERS - DEALERS IN
ALL TYPES OF STEEL CONTAINERS
SPECIALIZING IN

OPEN HEAD CONTAINERS FEATURING CHEMICAL-SOLVENT PROOF-BACCO-ON 56 PULASKI STREET, P.O. BOX 589, PEABODY, MASS. 01960
NORTH SHORE AREA CALL 532-1130 — BOSTON AREA CALL 322-9110

"SERVING INDUSTRY FOR OVER HALF A CENTURY"

#### EMPTY DRUG CERTIFICATION

lubres, certify that these drums are "empty as that term is defined in the national Environmental Protection Agency regulations, 40 CFR 261.7*, and that they have been properly prepared for transportation under the regulations of the U.S. Department of Transportation, 49 CFR 173.29.**

Date: 3/4/87 Slip number: 2/9/3
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*With regard to most regulated residues, EFA's 40 CFR 261.7 says: "A container...is empty if:

- (i) All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, e.g., pouring, pumping, and aspirating, and
- (ii) No more than 2.5 centimeters (one inch) of residue remain on the bottom of the container...."

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SERVICE CHEMICAL CORPORATION

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NORTH EAST SOLVENTS CORPORATION

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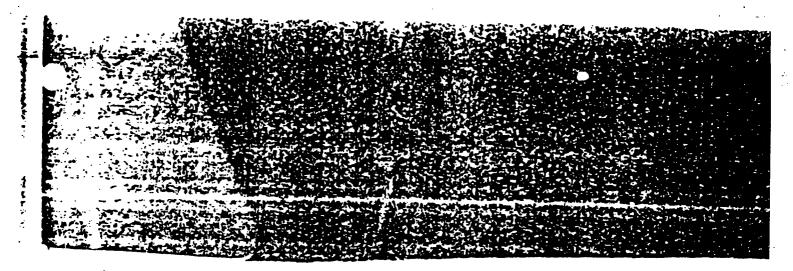
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THE ACKNOWLEDGMENT COPY OF THIS PURCHASE ORDER MUST BE SIGNED. DATED, AND RETURNED PROMPTLY.

Hydraulic Conductivity Tests

Report Preparation

By RRParker

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IMPORTANT - INSTRUCTIONS TO VENDOR

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- $\boldsymbol{2}.$  MAIL INVOICES TO ADDRESS CHECKED ABOVE UNLESS OTHERWISE INDICATED.

TAB

- 3. SHOW PURCHASE ORDER NUMBER ON ALL INVOICES, SHIPPING NOTICES, BILL OF LADING, EXPRESS RECEIPTS, PACKAGES, AND PACKING SLIPS.
- 4: SHOW SHIPPING ADDRESS ON ALL SHIPPING PAPERS.

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Your order is hereby acknowledged and accepted. Shipment will be million services rendered in accordance with the above schedule:

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Her's Name_____

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Polyfibron Division \MR, Grace & Co.



This number must appear on all invoices, B/L's, packing lists and related correspondence. D 425#1_11 34 MUCHBUM #1

Please Note!	MET 345	CALF & I	EDDY TECHNO STREET M. NASS.	CLOGIES THE.	SHII	BILLTY. (  **SS PAN  **LEXIM	OF A COMPANY  RACE & COMPANY  BEN AVENUE  TON, MASS. 02173					
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W.R. GRACE & CO. ACCOUNT NUMBER	ITEM	QUANTITY ORDERED		PLEASE FUNNISH THE SERVICES SPECI	MATERIAL AND FIED BELOW	YOR	UNIT	UNIT PRICE	ITEM AMOUNT			
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Please Hote!			NDER YOUR INVOICE TO THE LOCATION NLESS OTHERWISE NOTED AT RIGHT	SHIP TO	59 WAL	n -cum) Pole si I, ma (	TREET			
то:	161 BR	FORBES AINTREE	IVIRONMENTAL CONSULTANTS S ROAD, SUITE 204 , MA 02184	•	' 55 hay	DEN AVE	COMPANY - 02173 (Bron Accor			
PURCHASE ORDER DATE 12/22/88		5411	NET 30		VENDOR NO.	DESTINATION				
1/29/89	POUTING	VENDOR	SUBJECT TO STAYE & LOCAL SALES & USE TAX	SUBJECT TO TAX EXEMPTION NO. 135-114-23						
WIR GRACE & CO. ACCOUNT MANGER	ITEM	OUANTITY ORDERED	PLEASE FURNISH THE MA SERVICES SPECIFIE	ATERIAL AND/OR		UNIT	UNIT PRICE	ITEM AMOUNT		
X5-185-20- 214	1	1	CONFIRMING - DO NOT DO PREPARE SITE HISTORY OF CUMING, INC - CANTON PHASE I/II SITE INVEST ACCORDANCE WITH PROPOSE REFERENCE GEC PROPOSE	FOR EMERSO, MA FIGATION I SAL: DATED	N 10/5/88.	EACH	\$2020.00	\$2020.00		
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			MENT COPY OF THIS PUR D. DATED, AND RETURNED			- <del>By</del>				
IMPORTANT - IN:	STRUC	TIONS TO	VENDOR			· ·				

1. RENDER INVOICE IN TRIPLICATE TO: W.R. GRACE & CO. POLYFIBRON DIVISION

2. MAIL INVOICES TO ADDRESS CHECKED ABOVE UNLESS OTHERWISE INDICATED.

3. SHOW PURCHASE ORDER NUMBER ON ALL INVOICES, SHIPPING NOTICES, BILL OF LADING, EXPRESS RECEIPTS, PACKAGES, AND PACKING SLIPS.

4. SHOW SHIPPING ADDRESS ON ALL SHIPPING PAPERS.

An acceptance of this order or any enigment of goods ordered hereby or furnishing of any services called for hersundar shall be an acceptance of the terms and conditions on the face and back hereof as the only terms and conditions applying to the purchase and sate of the said goods or services.

Your order is hereby acknowledged and accepted. Shipment will be made or services rendered in accordance with the above schedule.

Seller's Name

Date of Acceptance ...

REDACTED - CONFIDENTIAL BUSINESS INFORMATION

	June 1	, 1984	July	11,	1984
Sample:	<u>A</u>	<u>B</u>	<u>c</u>	D	E
Test					
BOD (mg/1)	<b>∠</b> .5	<b>∠</b> 2	< 2	<b>&lt;</b> 1	<b>&lt;</b> 2
COD (mg/1)	27	21	20	5.5	22
Н	6.4	6.7	7.2	6.6	7.
Ammonia (mg/1)	0.25	0.12	0.26	0.2	5 0.
Total Suspend Solids (mg/l)	6	9	39	-	25
Silver (mg/1)	0.02	0.02	< 0.02	<0.0	2 <b>८</b> 0.
Nickle (mg/l)	0.05	< 0.02	< 0.02	<0.0	2 <b>4</b> 0.
Lead (mg/l)	0.05	0.05	< 0.25	<b>∠</b> 0.2	5 <b>८</b> 0.
Total Organic Carbon (mg/l)	· <b>&lt;</b> 10	∠ 10	13	6.5	11
DOP (Mg/1)	<b>∠</b> 50	<b>∠</b> 50	<50 <	\$50	<b>4</b> 50
Methylene Chloride (/g/l)	-	-	-	4.2	10.
1, 1, 1, Trichloroethane Mg	/1)* -	<u>-</u>	_	-	_
Toluene (/g/l)*	-	-	-	-	-
Dichloroethane (g/1)*	-	21	-	-	-

A= Taken at non contact cooling water & ground water collection sump.

B= Taken at raceway discharge to river.

C= Taken at pond above plant (river spillway).

D= Taken at non contact cooling water & ground water collection sump.

E= Taken at raceway discharge to river.

* Detection threshold limits were  $5\mu$ g/l (5 ppb)



## The Commonwealth of Massachusetts

Department of Encironmental Quality Engineering Metropolitan Baston - Northeast Begion 5 Commonwealth Avenue

Makum, Massachusetts (180)

935-2160

March 1, 1985

Emerson & Cuming
Dewey and Almy Chemical Division
W.R. Grace and Company
\$9 Walpole Street
Canton, Ma. 02021

RE: CANTON-"Spill Control Audit at Plant #2" Engineering Report

Attention: Mr. Randolph M. Olson, Plant Manager

Dear Mr. Olson:

On February 27, 1985, Engineers from the Metropolitan Boston/Northeast Region of the Department of Environmental Quality Engineering, Division of Water Pollution Control, met with yo and Ms. Gina McCarthy of the Canton Board of Health to review and inspect the logress toward accomplishing the recommended actions contained in a report entered:

Imerson & Cuming
Canton, Massachusetts
Spill Control Audit

Plant No. 2"

The above report was prepared by Camp Dresser & McKee, Inc., and dated January, 1981. The report was requested in a letter from the Department, dated November 5, 1982 and was the result of an inspection of your facility at the above address on November 2, 1982. The inspection was conducted at the request of the Canton Board of Health to investigate the drainage patterns both inside and outside the plant as they related to any existing or potential discharge of pollutants to an existing raceway which flows under the building and property. The raceway is diverted from the East Branch River of the Neponset River and discharges back to the River through a 24 inch concrete pipe. The Board of Healths concern in this matter was the potential for any pollutants to reach the Town Wells downstream from your facility.

The inspection at that time did not reveal the presence of any existing discharges nor the appearance of any pollutants at the outfall pipe. However; the Department's letter did point out that due to the existance of the raceway, certain chemical storage and the use of these chemicals, or unauthorized use presented a potential discharge. Therefore; the Department recommended that some appropriate steps be taken to address this potential discharge.

As a result, the aformentioned report addressed these issues and made recommendations including, sealing the entrance to the raceway, sealing grates, trenches, drains and accesses from the plant, paving along Walpole Street, to

Emerson & Cuming Page-2-

divert groundwater run-off away from the building, constructing dikes and berms around potential spill areas and chemical storage areas and in general, better housekeeping procedures.

It was observed during the inspection that all of the above has been completed and that on-going improvements will continue to address the elimination of potential releases to the East Branch River. The Camp Dresser & McKee, Inc., report did reveal, as a result of their investigation, the discharge of non-contact cooling water i.e. steam condensate, air conditioning and a groundwater sump discharge to the raceway. These discharges will continue and an appropriate "NPDES" permit application has been made to EPA which was acknowledged by them in writing on June 13, 1984.

It is the Department's opinion that Emerson & Cuming has acted in good faith and has taken all appropriate steps as requested. The Department would like to extend its appreciation to you for your cooperation and continued efforts in this matter.

If you have any questioning regarding this matter, you may contact Mr. David G. Erekson of my staff at 935-2160.

Very truly yours,

William A. Krol, P.E.

Deputy Regional Environmental

Engineer

DGE/bc

cc: Canton Board of Health, 1492 Washington Street, Canton, Ma. 02021
Attention: Ms. Regina McCarthy
Department of Environmental Quality Engineering, Metropolitan Boston/
Northeast Region, 5 Commonwealth Avenue, Woburn, Ma. 01801
Attention: Richard Chalpin, Acting Regional Environmental Engineer
Department of Environmental Quality Engineering, Division of Hazardous
Waste, One Winter Street, Boston, Ma. 02108